Final Environmental Impact Report

City of Glendale Biogas Renewable Generation Project

August 2, 2021

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ERRATA ATTACHMENTS

A: Updated Project Emission Inventory
B: Updated Project Air Quality Model Input / Output
C: Updated Project Health Risk Assessment Information
D: Updated Project GHG Emission Inventory
E: Noise Monitoring Sheets

DOCUMENT ERRATA

The following minor revisions or errata have been made to correct spelling and/or typing errors and additions within the Final EIR. Additions and corrections are in Red text and deletions can be found as strikethrough black text (i.e. ~~text~~). Note that Sections 9 (Response to Comments) and 10 (Mitigation Monitoring and Reporting Plan) are included in the Final EIR as black text.

Section	Page	Errata
Table of Contents	TOC	Updated Table of Contents with Figures 4.3-2 and 4.3-3.
1.2.3	1.3 - 1.4	Updated text to reflect potential increase of LFG available.
4.2.2.3	4.51	Updated text to include South Coast Air Quality Management District Rule 1149 – Storage Tank and Pipeline Cleaning and Degassing.
4.2.4.4	4.61 - 4.62	Updated text to reflect potential increase of LFG available and volume combusted by proposed engines, regeneration flare, and waste flares.
	4.63	Updated emissions estimates in Tables 12 and 13.
	4.64 - 4.65	Updated background and Project impact data for Table 15.
	4.91	Updated text to related to potential air quality impacts of adjacent future recreation land use.
	4.95 - 4.96	Updated emissions estimates in Table 17 and related text.
	4.96 - 4.97	Deleted Table 18 and referenced updated Table 15.
4.2.4.7	4.98	Updated text to reference regenerative flare and waste flares.
	4.99	Updated text to address potential presence of dioxins and furans.
	4.100 - 4.101	Deleted Table 19.
4.2.4.10	4.102	Updated maximum individual cancer risk values in Table 20 .
4.2.4.11	4.102 – 4.103	Updated hazard index values in Table 21.
4.2.4.12	4.103	Updated text to show health risks to adjacent future recreation land use would be less than significant.
4.2.5	4.104	Updated text to show potential cumulative air quality impacts in consideration of adjacent future recreation land use would be less than significant.
4.3	Added Figure 4.3-2 (National Wetlands Inventory Map).	
	Added Figure 4.3-2 (Project Impact Areas).	
4.3.4	4.153	Updated Mitigation Measures BIO-3 and BIO-4.
	4.156	Updated Mitigation Measures BIO-5.
	4.158	Updated Mitigation Measures BIO-6.
	4.158 – 4.159	Added Mitigation Measures BIO-7A, 7B, and 7C related to bats.
	4.161	Updated Table 25 to provide clarification on temporary and permanent impacts.
	4.162 – 4.164	Updated Mitigation Measure BIO-8 (formerly BIO-7 in the Draft EIR).
4.6.4	4.204	Updated text and Tables 29 and 30 to reflect potential increase of LFG available.

4.7.4.6	4.220	Updated text to remove reference to Mitigation Measure FIRE-4: Firefighting Tools. Firefighting Tools are covered in Mitigation Measure FIRE-1: Fire Protection Plan.
5.6.5	5.17	Updated Table 55 indicating that transportation and traffic impacts of Alternative 3 would be greater than the proposed Project
5.6.6	5.18	Updated text to indicate Alternative 3 would have greater impacts to nine environmental factors compared to the proposed Project.
7.0	7.1 – 7.2	Updated references for the Final EIR.

ERRATA ATTACHMENTS

A: Updated Project Emission Inventory
B: Updated Project Air Quality Model Input / Output
C: Updated Project Health Risk Assessment Information
D: Updated Project GHG Emission Inventory
E: Noise Monitoring Sheets

INTRODUCTION

Project (refer to Section 5.0 for a discussion of alternatives to the proposed Project). However, the environmental baseline was updated in this EIR for the following resource categories and reasons.

Air Quality and Greenhouse Gases: At the time the previous IS/MND was prepared, LFG was mixed with natural gas, conveyed through an existing unground pipe system to the Grayson Power Plant (Grayson) and burned in boilers at Grayson to make steam for electricity generation. Since that time, none of the existing operating engines at Grayson have the capacity to burn LFG. During the process of evaluating potential environmental impacts of modernizing (or "repowering") the Grayson, the City learned that emissions from combusting the LFG in the existing Grayson boilers exceeded potential health risk notification and action plan thresholds established by the South Coast Air Quality Management District. Accordingly, since April 1, 2018, the City ceased combusting LFG at Grayson and has been flaring all of the LFG at the SCLF in compliance with the existing SCAQMD permit. The baseline air quality and greenhouse gas settings have correspondingly been updated in this EIR to reflect this change.

The South Coast Air Quality Management District additionally passed new regulations in January 2019 that requires landfills that do not convert 80% percent or more of LFG to beneficial use to replace the existing LFG flares with new flares that comply with more stringent NOX and VOC emissions. The potential environmental impact analysis of the proposed Project and alternatives to the proposed Project consider this regulatory update.

The City received comments during public review of the Draft EIR that expressed concern that the LFG volumes assumed in the previous IS/MND and Draft EIR were lower than more recent LFG volume estimates that became available after preparation of both Project environmental documents. The comments further noted that the EIR's potential air quality and climate change impacts should be evaluated based on more recent and higher LFG volume estimates. Based on an independent life estimate by SCS Engineers, the Scholl Canyon Landfill is currently estimated to reach capacity between 2025 and 2026 (SCS, 2020). A peak 135.26 MMBtu/hr LFG at a flow rate of 6,200 standard cubic feet per minute and 36 percent methane is expected to be produced and captured at Scholl Canyon Landfill during 2022. The volume and methane content of LFG would then decrease over time. Utilizing the peak volume and methane content of LFG as the basis for analyzing potential environmental impacts of the Project in this EIR represents a worst-case scenario as less LFG would be expected to be produced, captured, and combusted in post-2022 Project operation years. The reciprocating internal combustion engines do not require supplemental natural gas to operate when the LFG fuel source has an approximate methane content of 34 percent or more. When the methane content of the LFG fuel source is below approximately 34 percent, the reciprocating internal combustion engines require a two to three percent natural gas supplement. If required, natural gas makeup for the Project would be well below the ten percent maximum natural gas makeup threshold applicable to determining Renewable Portfolio Standard eligibility for which the Project qualifies. Additionally, any natural gas makeup required during Project operation would be at a future date when the volume and methane content of LFG available at Scholl Canyon Landfill decreases over time. At no time during operation would the Project combust more than 135.26 MMBtu/hr LFG at a flow rate of 6,200 standard cubic feet per minute and 36 percent methane (even if natural gas makeup is part of this fuel stream). Sections 4.2 (Air Quality) and 4.6 (Greenhouse Gas Emissions) have been updated in this Final EIR to reflect the assumed increase in available LFG volume and methane content. Ambient air quality background concentrations and



meteorological data was also updated in the air quality impact analysis in accordance with SCAQMD guidance.

Biological Resources: Public comments were received during the public hearing considering adoption of the previous IS/MND that the proposed Project could adversely impact the federally threatened and California Species of Special Concern coastal California gnatcatcher (*Polioptila californica californica*). While the previous environmental impact analysis determined a low likelihood of potential presence, Stantec conducted an additional biological survey of the proposed Project site on behalf of the City during preparation of this EIR to re-evaluate the biological setting of the site. The additional biological resources survey confirmed coastal California gnatcatcher (*Polioptila californica californica*) have low potential for occurrence at the proposed Project site due to limited and marginal habitat presence at the site as well as historic recorded occurrences within the proposed Project area. The nearest recorded occurrence is approximately 8.0 miles to the east; however, this observation was over 20 years ago. The most recent record is from 2005, approximately 10.0 miles to the southeast. A description of the updated biological resources setting of the proposed Project is included in Section 4.3 and Appendix C of this EIR.

Hazards and Hazardous Materials: American Society for Testing and Materials indicates a 180-day validity for Phase I Environmental Site Assessment reports; although the original report was not completed for a property transfer, it was conducted under the ASTM guidance and therefore, an updated report was required for submittal with the EIR. The updated Phase I Environmental Site Assessment is in included with this EIR as Appendix G. The update did not result in a change in baseline environmental conditions since the previous IS/MND.

1.2.4 Scoping Meetings

The NOP included notification of two public scoping meetings to be held to further inform public agencies and other interested parties of the proposed Project and to solicit input regarding the Draft EIR. The two public scoping meetings were held at the Glendale Police Department Community Room located at 131 N. Isabel Street in Glendale, CA on April 4, 2019 at 2:00 pm and again at 6:00 pm. These meetings afforded the public an opportunity to provide oral or written comments to the City regarding the scope and focus of the Draft EIR as described in the NOP and Initial Study. The meetings provided a brief presentation of the following information:

1. Purpose of the meetings;
2. Overview of the Project Description;
3. Summary of the Initial Study findings;
4. Review of alternatives being considered for further study within the EIR;
5. Opportunity for Public Comment; including speakers and comment cards; and
6. Closing Remarks discussing the CEQA review process, anticipated schedule, and where to find additional information and updates.

Oral and written comments received from the public were primarily related to the need for the proposed Project the proposed Project objectives as well as concerns for potential impacts to aesthetics, air quality,

ppmv VOC, and 250 ppmv CO (all at 15 percent O_2). Emission control systems such as the proposed selective catalytic reduction (SCR) and CO oxidization systems are needed in order for the proposed landfill gas engines to meet these emission standards.

South Coast Air Quality Management District Rule 1149 – Storage Tank and Pipeline Cleaning and Degassing

This rule requires controls of VOC emissions during the degassing of pipelines. The LFG pipeline would be purged of LFG as part of abandonment. The LFG would be displaced from the LFG pipeline by either pushing the gas from Grayson Power Plant to Scholl Canyon Landfill or by applying a vacuum to the pipeline from Scholl Canyon Landfill. The purged LFG would be collected at Scholl Canyon Landfill and combusted in the flares to avoid venting of the LFG to the atmosphere which would have greater GHG and odor impacts.

Rule 1150.1 – Control of Gaseous Emissions from Municipal Solid Waste Landfills

This rule requires landfill gas control devices to be operated continuously to reduce methane by at least 99 percent by weight and NMOC by at least 98 percent by weight or reduce the outlet NMOC concentration to less than 20 ppmv, dry basis as hexane at three percent oxygen. If lean burn engines are utilized as the gas control units, the engines shall reduce the outlet methane concentration to less 3,000 ppmv, dry basis, corrected to 15 percent oxygen. An initial source test for the proposed equipment will be required to demonstrate compliance with this rule.

South Coast Air Quality Management District Regulation XIII – New Source Review (NSR)

The SCAQMD regulatory framework includes two options for implementing new source review. Certain facilities included in the Regional Clean Air Market (RECLAIM) cap and trade program for NO_X and SO_X are subject to the new source review requirements of Regulation XX. Facilities that are not part of RECLAIM are subject to the NO_X and SO_X new source review requirements of Regulation XIII. New source review for VOC, CO and PM is administered through Regulation XIII for all facilities. The proposed Project is to construct and operate a new landfill gas energy recover facility; therefore, the proposed Project is exempted from the RECLAIM program. The Project is instead subject to the new source requirements of Regulation XIII for all criteria pollutants.

South Coast Air Quality Management District Rule 1303 – New Source Review Requirements: Best Available Control Technology

Rule 1303(a) requires any new or modified source which results in an emission increase of any nonattainment air contaminant, any ozone depleting compound, or ammonia to meet the BACT requirement. BACT is the most stringent emission limitation or control technology which has been achieved in practice (AIP), is contained in any state implementation plan (SIP) approved by the USEPA, or is another technology that has been found to be technologically feasible and cost effective by the Air District. **Table 6** provides a summary of recent BACT determination for the proposed equipment. The BACT determinations for NO_X, VOC, and CO for reciprocating internal combustion engines reflect compliance with emission standards in Rule 1110.2.



4.2.4.4 Operation Impacts due to Stationary Equipment

The Project includes construction and operation of an approximately 12-megawatt (MW) power generation facility that would utilize LFG as fuel to generate renewable energy (electricity). The engines will create emissions due to the combustion of landfill gas.

Based on the fact that the flare will incinerate landfill gas and it will be utilized as needed, its emissions will be analyzed as part of the emissions from the existing flares. The existing flares will operate intermittently as backup devices to incinerate excess landfill gas being produced that is not utilized by the electrical generating units, should one or more generating units be temporarily inoperable.

Because SCLF LFG quality may fluctuate, NG may be utilized to ensure combustion and engine operating efficiency. The augmentation with natural gas is exclusively to maintain the heating value of fuel to ensure combustion and efficient engine operation. The proposed facility will not use natural gas to increase engine utilization. SCAQMD Rule 1110.2 restricts NG combustion to no more than 10% of the fuel stream, based on annual heat input, and the limit on natural gas augmentation will be specified in the SCAQMD operating permit for the Project. Since NG is a cleaner fuel than landfill gas, it is more conservative to analyze the air quality impacts of the proposed engines based on operating emissions using 100 percent landfill gas as the worst-case scenario. When the landfill gas production at the SCLF declines, engine utilization will also decline because SCAQMD regulations and permit conditions will not allow ongoing operation in the absence of landfill gas

Reciprocating Internal Combustion Engines

The City is proposing to use four reciprocating internal combustion engines (RICE) General Electric Jenbacher Model J 620 GS-16 engines for the Project. Each engine has the ability to produce 3,018 kilowatts (KW) of power at 39.5 percent efficiency under International Organization of Standardization (ISO) conditions. At 100 percent operating load, each engine is estimated to be able to combust 1,383 standard cubic feet per minute (scfm) of LFG. ~~With the LFG production of 5,000 scfm, small amounts of natural gas will augment the landfill gas to increase intake fuel heating value which will allow all four engines be operated at 100 percent capacity during brief periods when peak utilization may be needed. Although it is expected that engine utilization will decline as LFG production declines, 100 percent annual utilization of LFG may occur in the first year of operation; therefore, it was used to determine the significance of air quality impacts.~~ As noted in Section 1.2.3 (Baseline Environmental Conditions), LFG production was estimated to be 6,200 scfm and 135.26 MMBtu/hr, based upon a measured heating value of 363.3 Btu/cf (36 percent methane). All four RICEs operating simultaneously can combust a total of 105.36 MMBtu/hr LFG.

The following emission factors were used to estimate the criteria pollutant emissions from the engines:

- 11 ppmv at 15 percent O_2 for NO_X and 30 ppmv at 15 percent O_2 emission factors were used based on the required emission limits pursuant to SCAQMD Rule 1110.2.
- The proposed engines will be equipped with oxidation catalysts to reduce the CO emissions. Based on the manufacturer data, uncontrolled CO emission of the engine is 250 ppmv at 15 percent O_2. While CO emission reductions of at least 90 percent can be expected due to the use of an oxidization catalyst, the emissions inventory and air quality analysis assumes a much



lower control efficiency and a controlled CO concentration of 130 ppmv at 15 percent O_2.

- The engine manufacturer PM10/2.5 emission rate of 0.066 grams per brake horsepower hour (g/bhp-hr), based upon SCAQMD BACT guidance.
- The SO_X emission factor was estimated based on 60 ppmv of sulfur content of landfill gas measured in H_2S as determined by SCAQMD as BACT.

The proposed engines will be equipped with SCR combined with oxidation catalysts to meet SCAQMD emission standards. However, uncontrolled emissions can occur during startup, commission, and maintenance activities. To account for the uncontrolled emission rates and estimate maximum daily emissions, the following daily operating schedule is assumed:

1. Three engines run 22 hours in normal operation and 2 hours in startup/shutdown mode.
2. One engine runs 12 hours in normal operation, 10 hours in maintenance, and 2 hours for startup/shutdown.

It is unlikely to have more than one engine in maintenance in the 24-hour period. Additionally, this type of operation will likely be limited to commissioning of the proposed Project to ensure the engines are operating properly prior to the loading of emission control catalyst.

Regenerative Gas Flare

As noted in Section 2.3.2, the LFG treatment system contains a regenerative gas flare. The regenerative gas flare would combust 5 MMBtu/hr LFG.

Waste Gas Flares

110.26 MMBtu/hr of the total 135.26 MMBtu/hr LFG available would be combusted in the RICEs and regeneration flare. The remaining 24.9 MMBtu//hr would be combusted in the waste flares.

Total Operational Phase Criteria Air Pollutant Emissions

The emissions from the LFG combustion in the existing flare system were used for the baseline emissions during operational phase. The baseline emissions reflected the flare emissions reported in SCAQMD Annual Emission Reporting Program in 2018. This emission inventory is included in Appendix B.2.

Table 12 summarizes the net emissions of the proposed Project based on the daily maximum ~~engine~~ emissions, the daily average flare emissions as the baseline emissions, and the quantity of Priority Reserve credits to offset the emission increases. **Table 13** compares the net emissions of the proposed Project to the SCAQMD screening level mass-emissions significance thresholds. The emission Inventory for the proposed RICE is also included in Appendix B.2.

To comply with SCAQMD Regulation XIII, Priority Reserve credits will be allocated to offset the emission increases of the proposed Project. After consideration of reduced emissions due to the reduced operation of the existing flares and the application of Priority Reserve credits through SCAQMD Rule 1309.1, net emissions of NO_X, VOC, PM10, PM2.5 and SO_X will be below SCAQMD daily mass emission significance thresholds. SCAQMD does not provide Priority Reserve offsets for CO emissions. As such, daily



emissions of CO are above the SCAQMD daily screening level mass emission significance thresholds. A more complex significance determination is made to demonstrate that emissions of CO are also below refined significance thresholds that are based upon ambient pollutant concentrations.

Table 12 Overall Air Quality Impact of the proposed Project in the Operational Phase

Pollutant	Total proposed Project (Engines Daily ~~Max.~~ Emissions (lbs./day)	Less: Existing Baseline Daily Landfill Gas Combustion Emissions (lbs./day)	Offset Allocations from the SCAQMD Priority Reserve (lbs./day)	Remaining Scholl Canyon Power Generating Facility Emissions (lbs./day)
NO_X	~~165~~ 190	90	~~75~~ 100	0
CO	~~919~~ 928	42	0	~~877~~ 886
VOC	~~114~~ 121	7	~~107~~ 114	0
PM10	~~58~~ 71	62	~~0~~ 9	~~[4]~~ 0
PM2.5	~~58~~ 71	62	0	~~[4]~~ 9
SO_X	~~81~~ 93	46	~~35~~ 47	0

Table 13 Comparison of Overall Operation Emissions with Significance Thresholds

Pollutant	Net Operation Emissions (lbs./day)	SCAQMD Mass Daily Significance Thresholds for Operation Emissions (lbs./day)	Exceed the Threshold (yes/no)
NO_X	0	55	NO
CO	~~877~~ 886	550	YES
VOC	0	55	NO
PM10	~~[4]~~ 0	150	NO
PM2.5	~~[4]~~ 9	55	NO
SO_X	0	150	NO

Without the Priority Reserve credits, NO_X, CO, and VOC emissions of the proposed Project would exceed the significance thresholds. Air dispersion modeling was conducted to analyze further impact of pollutants emissions. Air dispersion modeling was not conducted for VOC since there is no State or Federal ambient air quality standards. The data inputs for the emission modeling are provided in **Table 14**.

Table 14 American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) Input Parameters

Input Parameters Type	Specification
Engines Exhaust Information:	
Stack Height:	40 ft.
Stack Diameter:	2 ft.
Stack Temperature:	797 °F
Exhaust Flow (Wet):	481,020 scfh

Table 15 summarizes the ambient air quality impacts from operating the proposed engines, regenerative flare, and waste flares simultaneously to combust the peak annual volume of LFG expected to be available. ~~As discussed in Section 4.2.1.2, t~~The background concentration is based upon the highest values recorded for the years ~~2014~~ 2015 through ~~2018~~ 2019 pursuant with SCAQMD recommendations made during public review of the Draft EIR. The values shown in **Table 15** are the highest pollutants concentration values at any receptors outside the SCLF boundary from operating the proposed RICEs, regenerative flare, and waste flares to combust 135.26 MMBtu/hr LFG. The air quality impact analysis methodology and results summarized in Table 15 included a revised and more conservative SCLF boundary than that assumed in the Draft EIR pursuant with SCAQMD recommendations made during public review of the Draft EIR. Model results demonstrate that the proposed Project will not cause an exceedance of NO_2, CO, or PM2.5 ambient air quality standards. PM10 and PM2.5 background ambient concentrations already exceed federal or state standards, but the increase in concentrations resulting from the proposed Project are below allowable thresholds established by SCAQMD. Detailed model input and output information is provided in Appendix B.3.

Table 15 AERMOD Model Output – Baseline Landfill Property Limits

Pollutant	Averaging Period	Project Impact	Background[a]	New Ambient	Limiting Standard	Type of Standard
NO_2[b]	1-HR	~~0.030~~ 0.03702 ppm	~~0.075~~ 0.0719 ppm	~~0.105~~ 0.1089 ppm	0.18 ppm	CAAQS
NO_2[b]	1-HR (98th %)	~~0.014~~ 0.02083 ppm	~~0.060~~ 0.0593 ppm	~~0.074~~ 0.0801 ppm	0.10 ppm	NAAQS
NO2[c]	Annual	~~0.00015~~ 0.00023 ppm	~~0.017~~ 0.0154 ppm	~~0.017~~ 0.0156 ppm	0.03 ppm	CAAQS
CO	1-HR	~~0.0145~~ 0.1748 ppm	~~3.0~~ 2.6 ppm	~~3.01~~ 2.7748 ppm	20 ppm	CAAQS
CO	8-HR	~~0.0344~~ 0.0473 ppm	~~1.8~~ 1.6 ppm	~~1.83~~ 1.6473 ppm	9 ppm	CAAQS
PM10	24-HR	~~1.07~~ 1.373 ug/m^3	96 ug/m^3	~~97.07~~ 97.373 ug/m^3	Allowable increase of 2.5 ug/m^3	CAAQS/SCAQMD Allowable Increase
PM10[d]	24-HR (6th highest over 5 years)	~~0.065~~ 1.046 ug/m^3	96 ug/m^3	~~96.065~~ 97.046 ug/m^3	150 ug/m^3	NAAQS
PM10	Annual	~~0.118~~ 0.193 ug/m^3	~~35.4~~ 34.4 ug/m^3	~~35.52~~ 34.593 ug/m^3	Allowable increase of 1.0 ug/m^3	CAAQS/SCAQMD Allowable Increase
PM2.5	24-HR	~~1.07~~ 1.373 ug/m^3	~~59.9~~ 30.5 ug/m^3	~~60.97~~ 31.873 ug/m^3	Allowable increase of 2.5 ug/m^3	CAAQS/SCAQMD Allowable Increase
PM2.5	24-HR (8th highest)	~~0.35~~ 0.956 ug/m^3	~~38.0~~ 30.5 ug/m^3	~~38.35~~ 31.456 ug/m^3	Below SIL of 1.2 ug/m^3	EPA Significant Impact Level (SIL)

Pollutant	Averaging Period	Project Impact	Background[a]	New Ambient	Limiting Standard	Type of Standard
PM2.5[e]	Annual	~~0.118~~ 0.193 ug/m^3	~~12.38~~ 12.58 ug/m^3	~~12.50~~ 12.773 ug/m^3	Below SIL of 0.3 ug/m^3 Allowable increase of 1.0 ug/m^3	EPA Significant Impact Level (SIL) CAAQS/SCAQMD Allowable Increase
SO_2	1-HR	0.0026 ppm	0.018 ppm	0.021 ppm	0.25 ppm	CAAQS
SO_2[f]	1-HR (99th %)	0.0014 ppm	0.0094 ppm	0.0108 ppm	0.075 ppm	NAAQS
SO_2	24-HR	0.0006 ppm	0.002 ppm	0.0026 ppm	0.04 ppm	CAAQS

Notes:

a) The background values are based on the highest concentrations monitored during ~~2014~~ 2015 through ~~2018~~ 2019.

b) The NO_2 1-hour modeling was refined using the AERMOD Ambient Ratio Method Version 2 (ARM2) option.

c) The NO_2 annual modeling was refined using the AERMOD ARM option, which assumed an 80% conversion factor of NO_X to NO_2.

d) The PM10 24-hour modeled values were based on the maximum 6th highest concentration over 5 years period.

e) The PM2.5 24-hour modeled values were based on the 8th highest concentration averaged over 5 years period with the background concentrations of 98th percentile of 24-hour data averaged over 5 years period.

f) The SO_2 1-hour modeled values were based on the 4th highest concentration averaged over 5 years period with the background concentrations of 99th percentile of 1-hour data averaged over 5 years period.

g) There are receptors surrounding the facility at lower and higher elevations than the emission sources. The model was run on non-default option (flat terrain) on all receptors at lower elevations; and a default option (complex terrain) was selected to on receptors above the emission sources base elevation. The project impact values shown are the highest values from both model runs.

Data Source: The output of air dispersion model conducted using Providence BEEST AERMOD software (version 16216r).

Figures 4.2-1 A through **L** show the maximum concentration readings for criteria pollutants outside the landfill property boundary.

Due to the application of SCAQMD BACT; the offsetting of emissions from SCAQMD priority reserve; and compliance with all applicable laws, ordinances, and regulations; air quality impacts of the proposed Project are less than significant for all pollutants other than CO as shown in Tables 13. For all pollutants other than CO, daily mass emissions are below the thresholds of significance that are included in Table 13. Pursuant to SCAQMD policy, an ambient air quality impact analysis was then conducted to determine the significance of CO emissions. Table 15 and Figures 4.2-1A through 4.2.1L show ambient air quality impact analysis results for all criterial pollutants, including CO, demonstrate that project impacts are less than significant and would not conflict or obstruct implementation of the air quality plan.

While it is not known when and what areas of the Scholl Canyon Landfill will be closed, or when such closed landfill areas will be ready for conversion to uses specified in the JPA, it is nonetheless reasonably foreseeable that such a conversion of use will occur at some point in the future. The air quality impact analysis described above which considers simultaneously operating the proposed engines, regenerative flare, and waste flares to combust 135.26 MMBtu/hr LFG show that potential exceedances to ambient air quality would be limited to within 100 meters of the power generation facility. Future recreation land use in adjacent areas after landfill closure could therefore be expected to have a 100-meter buffer from the power generation facility boundary. However, this buffer would represent a small area compared to that available for recreation and would be consistent with the requirements of the JPA.

Mitigation Measures

No mitigation measures are required.

Threshold: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?

See Section 4.2.5, Cumulative Impacts, below for a discussion of cumulative air quality impacts.

Threshold: Expose sensitive receptors to substantial pollutant concentrations?

In addition to the regional significance thresholds, SCAQMD has also developed LSTs to screen projects for potentially substantial localized impacts from daily emission levels from construction and operation based on the project location, size, and distance to the nearest sensitive receptor, which includes residential homes, schools, hospitals, and nursing homes. The nearest sensitive receptors are located more than 2,200 feet from the emission sources. **Figure 4.2-2** shows the location of the sensitive receptor relative to the proposed Project site.

Localized Construction Impacts

As discusses previously in this report, LSTs for the proposed project are based a project area of two acres because LSTs for a larger project are less stringent. SCAQMD requires the mass rate look-up table in the "Finalized Localized Significance Threshold Methodology" document to be used. **Table 16** shows that the impacts of Project construction emissions to the localized air quality are below the significance thresholds.

Table 16 Localized Significance Threshold Construction Analysis

Pollutant Type	Max. Daily Emissions (lbs./day)	SCAQMD Significance Threshold for Construction (lbs./day)	Exceed Threshold (yes/no)
NO_X	41	175	NO
CO	33	7,957	NO
PM10	8.2	160	NO
PM2.5	4.9	82	NO

Notes:
a) The maximum daily emissions for construction activity are the emissions from the earth-moving activity.

Based on **Table 16**, the air quality impact of construction activity to the nearest sensitive receptor will be less than significant.

Mitigation Measures

No mitigation measures are required.

Localized Operation Impacts

Table 17 compares the impacts of project operation emissions to the localized air quality threshold based on the SCAQMD look-up table.

Table 17 Localized Significance Threshold Operation Analysis

Pollutant Type	~~Net~~ Operation Emissions (lbs./day)	SCAQMD Significance Threshold (lbs./day)	Exceed Threshold (yes/no)
NO_X	~~75~~ 190	175	~~NO~~ YES
CO	~~877~~ 928	7,957	NO
PM10	~~[4]~~ 71	39	NO
PM2.5	~~[4]~~ 71	20	NO

Notes:
- The net operation emissions include the ~~maximum~~ daily emissions from engines, regeneration flare, and waste flares without subtraction of existing baseline waste flare emissions~~. less baseline emissions~~. Note that if baseline waste flare emissions were considered, the potential increase in NO_X emissions from the Project would not exceed the LST for NO_X.

As shown in **Table 17**, ~~the air quality impact of operation activity to the nearest sensitive receptor is expected to be less than significant~~ only NOx emissions would exceed the applicable LST (and only when not considering the baseline emissions from the existing waste flares). Pursuant with SCAQMD's LST Guidance, an air quality impact analysis and dispersion modeling were conducted to further evaluate the potential significance of NO_X emissions. As shown in Table 15, the results of the air quality impact analysis and dispersion modeling show proposed Project NO_X emissions would not exceed an applicable air quality standard and would result in a less than significant localized air quality impact.

~~In addition to mass emission analysis, air dispersion modeling was performed to estimate the concentrations of NO_2, CO, PM10 and PM2.5 from the operational emissions of the proposed Project to determine the localized air quality impacts on the state and federal ambient air quality standards.~~

~~**Table 18** summarizes the results of the model and compares them with the ambient air quality standards. Detail model input and output information is provided in Appendix B.3.~~

~~Table 18 AERMOD Model Output~~

~~Pollutant~~	~~Averaging Period~~	~~Project Impact~~	~~Background[a]~~	~~New Ambient~~	~~Limiting Standard~~	~~Type of Standard~~
~~NO_2[b]~~	~~1-HR~~	~~0.030 ppm~~	~~0.075 ppm~~	~~0.105 ppm~~	~~0.18 ppm~~	~~CAAQS~~
~~NO_2[b]~~	~~1-HR (98th %)~~	~~0.014 ppm~~	~~0.060 ppm~~	~~0.074 ppm~~	~~0.10 ppm~~	~~NAAQS~~
~~NO2[c]~~	~~Annual~~	~~0.00015 ppm~~	~~0.017 ppm~~	~~0.017 ppm~~	~~0.03 ppm~~	~~CAAQS~~
~~CO~~	~~1-HR~~	~~0.0145 ppm~~	~~3.0 ppm~~	~~3.01 ppm~~	~~20 ppm~~	~~CAAQS~~
~~CO~~	~~8-HR~~	~~0.0344 ppm~~	~~1.8 ppm~~	~~1.83 ppm~~	~~9 ppm~~	~~CAAQS~~
~~PM10~~	~~24-HR~~	~~1.07 ug/m^3~~	~~96 ug/m^3~~	~~97.07 ug/m^3~~	~~Allowable increase of 2.5 ug/m^3~~	~~CAAQS/SCAQMD Allowable Increase~~
~~PM10[d]~~	~~24-HR (6th highest over 5 years)~~	~~0.065 ug/m^3~~	~~96 ug/m^3~~	~~96.065 ug/m^3~~	~~150 ug/m^3~~	~~NAAQS~~
~~PM10~~	~~Annual~~	~~0.118 ug/m^3~~	~~35.4 ug/m^3~~	~~35.52 ug/m^3~~	~~Allowable increase of 1.0 ug/m^3~~	~~CAAQS/SCAQMD Allowable Increase~~
~~PM2.5~~	~~24-HR~~	~~1.07 ug/m^3~~	~~59.9 ug/m^3~~	~~60.97 ug/m^3~~	~~Allowable increase of 2.5 ug/m^3~~	~~CAAQS/SCAQMD Allowable Increase~~
~~PM2.5~~	~~24-HR (8th highest)~~	~~0.35 ug/m^3~~	~~38.0 ug/m^3~~	~~38.35 ug/m^3~~	~~Below SIL of 1.2 ug/m^3~~	~~EPA Significant Impact Level (SIL)~~
~~PM2.5[e]~~	~~Annual~~	~~0.118 ug/m^3~~	~~12.38 ug/m^3~~	~~12.50 ug/m^3~~	~~Below SIL of 0.3 ug/m^3~~ ~~Allowable increase of 1.0 ug/m^3~~	~~EPA Significant Impact Level (SIL)~~ ~~CAAQS/SCAQMD Allowable Increase~~

~~Pollutant~~	~~Averaging Period~~	~~Project Impact~~	~~Background[a]~~	~~New Ambient~~	~~Limiting Standard~~	~~Type of Standard~~

~~Notes:~~

~~a. The background values are based on the highest concentrations monitored during 2014 through 2018.~~

~~b. The NO_2 1-hour modeling was refined using the AERMOD Ambient Ratio Method Version 2 (ARM2) option.~~

~~c. The NO_2 annual modeling was refined using the AERMOD ARM option, which assumed an 80% conversion factor of NO_x to NO_2.~~

~~d. The PM10 24-hour modeled values were based on the maximum 6th highest concentration over 5 years period.~~

~~e. The PM2.5 24-hour modeled values were based on the 8th highest concentration averaged over 5 years period with the background concentrations of 98th percentile of 24-hour data averaged over 5 years period.~~

~~f. There are receptors surrounding the facility at lower and higher elevations than the emission sources. The model was run on non-default option (flat terrain) on all receptors at lower elevations; and a default option (complex terrain) was selected to on receptors above the emission sources base elevation. The project impact values shown are the highest values from both model runs.~~

~~Data Source: The output of air dispersion model conducted using Providence BEEST AERMOD software (version 16216r).~~

The values shown in **Table ~~18~~ 15** are the highest pollutants concentration values at any receptors outside the SCLF boundary from operating the proposed ~~electrical generating units~~ RICEs, regenerative flare, and waste flares to combust 135.26 MMBtu/hr LFG ~~at any receptors outside the SCLF boundary~~. The air quality impact analysis methodology and results summarized in **Table 15** included a revised and more conservative SCLF boundary than that assumed in the Draft EIR pursuant with SCAQMD recommendations made during public review of the Draft EIR. These values are below the significance thresholds; therefore, the localized air quality impacts during the operation activities of the proposed Project are expected to be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Less than Significant Impact

Toxic Air Contaminants Health Impacts

4.2.4.5 Toxic Air Contaminant Emissions Impact Due to Earth Moving Activity During Construction Phase

TAC emissions associated with earth moving activity will consist primarily of combustion byproducts from off-road equipment and vehicle trips. Project construction is proposed to take place over a period of 18 months. TAC emissions from construction activity will not have significant health impacts relative to cancer and non-cancer chronic risks because these risks typically occur over continuous exposure for eight to 30 years.

Additionally, the impacts of earth moving activity will typically occur within the Project fence line. The nearest residential and worker receptor is more than 2,200 feet to the east of the emission sources. Therefore, the TAC emission impacts from earth moving activity are expected to be less than significant.



Mitigation Measures

No mitigation measures are required.

4.2.4.6 Toxic Air Contaminant Emission Impacts During Operational Phase

The proposed Project site is located within the boundaries of SCLF in Los Angeles County northwest of the intersection between Ventura Freeway (State Route 134) and State Route 2. The nearest residence is located approximately one-half mile to the east of the proposed Project site. The nearest non-residential sensitive receptors are Dahlia Heights Elementary School, Eagle Rock Montessori School, and California Academy for Liberal Studies Charter Middle School. These schools are located within one mile to the south of the proposed Project site. Toxic pollutant emission concentrations from the proposed Project will disperse substantially before reaching these sensitive receptors.

This section discusses whether the TAC emissions from the proposed Project will have the potential to cause significant public health impacts in the surrounding area. A detailed Tier IV Health Risk Assessment was performed to quantify and assess potential health risk impacts. The Health Risk Assessment modeling was conducted using the air dispersion model (BEEST AERMOD) and the ARB).HARP2

The Health Risk Assessment generally consists of the following steps to estimate health impacts:

- Identify the types and amount of toxic air contaminants generated from the project with consideration of operating profiles, fuel consumption and emission control systems;
- Estimate ground level TAC concentrations at each receptor location using air dispersion modeling;
- Estimate the amount of pollutants to which people could be exposed through inhalation, ingestion, and dermal contact; and
- Characterize the potential health risks by comparing worst-case exposure to safe standards based on known health effects.

4.2.4.7 Toxic Air Contaminant emissions inventory

TAC emissions associated with the proposed Project will consist primarily of combustion byproducts produced by the electrical generating units, regenerative flare, and waste flares. TACs are compounds designated by the California Office of Environmental Health Hazard Assessment (OEHHA) as pollutants that may cause a significant health hazard.

TAC emissions were calculated based on the following parameters:

- Concentrations of TAC compounds are based on the average analysis results of LFG samples taken in the years 2013 to 2015. The Sanitation Districts of Los Angeles County (LACSD) has compiled subsequent emissions and fuel analyses during 2016 through 2018. The subsequent test results indicate a decrease in many toxic pollutants on a lb./MMBtu basis relative to the 2013-2015 analyses. Because the 2016-2018 emission rates and resulting health risks are lower than what was reflected in the initial MND assessment, the more conservative MND values from 2013-2015 were used for this EIR.



- Concentrations of additional TAC compounds are based on the USEPA AP-42, *Chapter 2.4: Municipal Solid Waste Landfills, Table 2.4-1, Default Concentrations of LFG Constituents*.
- Formaldehyde emission factors are obtained from ARB California Air Toxics Emission Factors (CATEF) database (http://www.arb.ca.gov/app/emsinv/catef_form.html) for engines. For flares, the emission factor is based on SCAQMD *Supplemental Instruction for AB2588 Facilities for Reporting Their Quadrennial Air Toxic Emissions Inventory.* The AB2588 emission factors have generally been shown to be more conservative than emission factors that have been measured by LACSD.
- The concentration of organic toxics in the landfill gas will be reduced by the combustion process of the engines. Residual post-combustion organic compounds will be further controlled through the oxidation reaction due to the use of a catalytic converter. The control efficiency of RICE is calculated based on the NMOC destruction efficiency of 86.1 percent for non-halogenated species and 93.0 percent for halogenated species within the collected landfill gas per USEPA AP-42, Chapter 2.4, Table 2.4-3. The catalyst destruction efficiency for post-combustion organic TACs is 97.7 percent, which is the default control efficiency used in the SCAQMD Rule 1401 Calculator.
- An ammonia concentration of 5 ppmv at 15 percent oxygen is based on the SCAQMD BACT determination for a similar project (LFG-fired RICE at Frank R. Bowerman landfill).
- Dioxins and furans compound emissions were included in the analysis as part of the LFG combustion from the regenerative and waste flare systems. Based on several reference documents, such as USEPA AP-42 chapter 2.4, CARB California Air Toxics Emission Factors (CATEF) database search, and SCAQMD AB2588 quadrennial Air Toxics Emission Inventory Procedures dated June 2020, dioxins and furans compounds emissions are not expected to come from internal combustion engines because the proposed engines will be equipped with oxidization catalysts that are designed to destroy organic emissions, including dioxins and furans. However, USEPA AP-42, chapter 2.4 draft report dated October 2008 shows possible dioxin and furans compounds from flares. Therefore, the health risk assessment was updated by including dioxins and furans compounds from the flare systems. The November 2018 source test conducted on the LFG combustion in the boiler at Grayson Power Plant was used to estimate the dioxins and furans emissions for purposes of evaluating potential air quality impacts of the Project. The source test shows an octachlorodibenzo-p-dioxin emission factor of 5.33E-10 lbs./mmcf. While the boilers at Grayson Power Plant and the flares at Scholl Canyon Landfill are not equipped with emissions control systems capable of removing dioxins and furans, as noted above, the reciprocating internal combustion engines proposed for the Project would be equipped with oxidization catalysts that destroy dioxins and furans preventing their release into the atmosphere.

Since Polycyclic aromatic hydrocarbons (PAH) concentrations are not detected in the SCLF gas analysis and the EPAUS AP-42 study on default chemical concentrations for LFG constituents shows no detection on PAH, they are not reflected in the toxic emission inventory. The absence of PAH from the inventory is also in accordance with SCAQMD engineering analyses for similar landfills and consultation with LACSD.

~~As discussed in the previous sections of this report, the MND previously prepared for this Project includes emissions from LFG combustion in the flare system during construction and emissions from LFG combustion in the RICE for the operational phase of the proposed Project. For the analysis considered in this EIR, waste flare operations are included in the construction phase of the proposed Project as well as~~



pre-Project operations. **Table 19** summaries the TAC emissions from the RICE during Project operations. **Table 19** also compares Project TAC emissions with TAC emissions from the flare operations that occur as baseline conditions and will continue through the construction phase of the proposed Project. Detailed emission calculations for TACs are provided in Appendix B.4.

Table 19 TAC Emission Summary – Project

TAC	Chemical Abstracts Service # (CAS#)	Engines (lb./hr.)	Flares (pre-Project and Construction) (lb./hr.)
1,1,1 – Trichloroethane	71-55-6	3.87E-06	4.34E-05
1,1,2,2 – Tetrachloroethane	79-34-5	2.57E-04	2.89E-03
1,2 – Dibromoethane	106-93-4	1.06E-05	1.19E-04
1,1 – Dichloroethane	75-34-3	5.33E-06	5.98E-05
1,1 – Dichloroethene	75-35-4	2.54E-06	2.86E-05
1,2 – Dichloroethane	107-06-2	1.39E-05	1.56E-04
1,2 – Dichloropropane	78-87-5	2.81E-05	3.15E-04
2 – Propanol	67-63-0	8.26E-03	4.67E-02
Acetonitrile	75-05-8	1.06E-04	5.99E-04
Acrylonitrile	107-31-1	9.21E-04	5.21E-03
Ammonia	7664-41-7	2.70E-01	0.00E+00
Benzene	71-43-2	3.66E-04	2.07E-03
Benzyl chloride	100-44-7	2.27E-05	2.55E-04
Carbon disulfide	75-15-0	1.21E-04	6.85E-04
Carbon tetrachloride	56-23-5	4.46E-06	5.01E-05
Carbonyl sulfide	463-58-1	8.07E-05	4.56E-04
Chlorobenzene	108-90-7	2.47E-05	2.77E-04
Chlorodifluoromethane	75-45-6	1.55E-04	1.74E-03
Chloroethane	75-00-3	1.11E-04	1.25E-03
Chloroform	67-66-3	3.30E-06	3.70E-05
Chloromethane	74-87-3	8.44E-05	9.47E-04
Dichlorobenzene	106-46-7	1.66E-04	1.87E-03
Dichlorodifluoromethane	75-71-8	2.62E-03	2.94E-02
Dichlorofluoromethane	75-43-4	3.72E-04	4.18E-03
Dichloromethane (methylene chloride)	74-87-3	1.40E-05	1.57E-04
Ethylbenzene	100-41-4	8.00E-04	4.52E-03
Ethylene dibromide	106-93-4	2.59E-07	2.91E-06
Formaldehyde	50-00-0	9.85E-03	3.51E-01
Fluorotrichloromethane	75-69-4	1.44E-04	1.62E-03

~~TAC~~	~~Chemical Abstracts Service # (CAS#)~~	~~Engines (lb./hr.)~~	~~Flares (pre-Project and Construction) (lb./hr.)~~
~~Hexane, n-~~	~~110-54-3~~	~~1.55E-03~~	~~8.78E-03~~
~~Hydrogen chloride~~	~~7647-01-0~~	~~1.78E+00~~	~~1.61E+00~~
~~Hydrogen sulfide~~	~~7783-06-4~~	~~3.15E-03~~	~~1.78E-02~~
~~Mercury (total)~~	~~7439-97-6~~	~~5.03E-05~~	~~4.54E-05~~
~~Methyl ethyl ketone~~	~~78-93-3~~	~~1.40E-03~~	~~7.93E-03~~
~~Methyl isobutyl ketone~~	~~108-10-1~~	~~5.14E-04~~	~~2.90E-03~~
~~Tetrachloroethylene~~	~~127-18-4~~	~~3.53E-05~~	~~3.96E-04~~
~~Toluene~~	~~108-88-3~~	~~1.37E-03~~	~~7.77E-03~~
~~Trichloroethylene~~	~~79-01-6~~	~~1.62E-05~~	~~1.81E-04~~
~~Vinyl chloride~~	~~75-01-4~~	~~8.03E-06~~	~~9.01E-05~~
~~Xylenes~~	~~1330-20-7~~	~~1.41E-03~~	~~7.95E-03~~

~~Note: Some of the toxic emissions were calculated based on AP-42 and CATEF emission factors; and these default emission factors are typically higher than actual emission factors.~~

4.2.4.8 Air Dispersion Modeling of Toxic Air Contaminants Emissions

The AERMOD dispersion model was used to estimate the ground level TAC concentration resulting from the proposed Project. A normalized emission rate of one gram per second was used to model each source. Similar to the air quality impact analysis, a uniform Cartesian receptor grid covering an area of 36 square kilometers (8,900 acres) with 50 meters (164 feet) spacing was used in addition to the identification of discrete fence-line receptors.

4.2.4.9 Health Risk Characterization

The result of the dispersion modeling analysis was imported to HARP2 to determine MICR and non-cancer acute and chronic health risks. As defined in SCAQMD Rule 1401, MICR is the estimated probability of a potential maximally exposed individual contracting cancer as a result of exposure to TAC. Cancer risks were estimated based on 30-year continuous exposure duration for residential and sensitive receptors and a 25-year, five day per week, and eight hours per day exposure duration for worker receptors. Based upon SCAQMD Rule 1401 and the SCAQMD CEQA significance thresholds, a cumulative MICR increase less than ten in a million is considered to be less than significant when Best Available Control Technology for Toxics (T-BACT) is used. For this Project, the proposed RICE and the existing flares are expected to reduce a minimum of 98 percent of NMOC, which represents T-BACT. Additionally, a cancer burden greater than 0.5 excess cancer cases in areas with an incremental increase greater than one in one million individuals is considered to be significant.

To assess acute and chronic non-cancer exposures, annual and one-hour TAC ground-level concentrations are compared with the reference (safe) exposure levels (REL), which is developed by OEHHA. A hazard index (HI) is the ratio of TAC exposure of one hour for acute and long-term level for chronic from the facility to the REL. The total HI is calculated separately for acute and chronic effects. A



total hazard index of less than one is considered to be below significance. Detail MICR and HI for acute and chronic results are provided in Appendix B.5.

4.2.4.10 Maximum Individual Cancer Risk

Table 20 summarizes the maximum MICR values of any (residential ~~and~~ or worker receptors ~~for each operating scenario~~.

Table 20 Maximum MICR Values

~~Equipment~~ Scenario	Max. MICR for any ~~Residential~~ Receptor	~~Max. MICR for Worker Receptor~~	~~CEQA~~ OEHHA and SCAQMD Cancer Risk Significance Threshold	Exceed Significance Threshold?
~~IC Engines[a]~~ Risk to Residential or Worker Receptors Outside Existing Landfill Boundary	~~4.74E-08~~ 0.26E-06	~~3.32E-09~~	10.00E-06	NO
~~Flares (during construction phase)[a,b]~~ Risk to Recreation Users Outside Proposed Power Generation Facility Boundary	~~1.24E-07~~ 7.8E-06	~~1.86E-09~~	10.00E-06	NO

Note:

~~a) The MICR values are the highest values of any receptors outside the landfill boundary. Since the values are already below the significance threshold of 10.00E-06, no further analysis was conducted to obtain readings at the nearest residential or worker receptors.~~

~~b) The cancer risk of the flares was based on 2 years exposure duration for both residential and worker receptors to reflect impact during construction activities.~~

Note: The cancer risk, chronic health index, chronic 8-hour health index, and acute health index values of the proposed Project which were modeled pursuant with Office of Environmental Health Hazard Assessment (OEHHA) Guideline and SCAQMD Risk Assessment Procedures for Rule 1401, 1401.1 and 212. are the highest values of any receptors outside the existing landfill property boundary and power generation facility. Analysis assumes RICEs, regenerative flare, and waste flares combusting 135.26 MMBtu/hr LFG). Since the values are already below the SCAQMD significance threshold of 10E-06 for cancer risk and 1.00 for the health index, no further analysis was conducted to obtain readings at the nearest residential or worker receptors.

Data source: ~~the h~~Health risk assessment conducted in 2021, model output using HARP2

The health risk assessment shows the MICR values of 7.80 in a million at any receptors outside the power generation facility. Since the landfill is expected to be used only for recreational use not residential homes or workers, the MICR values of the Project are expected to be lower than 7.80 in a million.

4.2.4.11 Chronic and Acute Hazard Index

Table 21 summarizes the overall chronic and acute HI values ~~for each operations scenario~~. The acute HI values were calculated for each receptor for the combined impact of all chemicals on target organs.

Table 21 Overall HI Values

	Chronic Hazard Index	Acute Hazard Index		

~~Equipment~~ Scenario	Any Receptor ~~Residential~~ (HIC)	Any Receptor 8-hr ~~Worker (HIC)~~	Any Receptor ~~Residential~~ (HIA)	~~Worker (HIA)~~	~~CEQA~~ OEHHA and SCAQMD Chronic/ Acute Significance Threshold	Exceed Significance Threshold?
~~IC Engines[a]~~ Risk to Residential or Worker Receptors Outside Existing Landfill Boundary	~~9.52E-03~~ 0.016	~~9.52E-03~~ 0.0008	~~2.16E-03~~ 0.0076	~~2.16E-03~~	1.00	NO
~~Flares (during construction phase)[a,b]~~ Risk to Recreation Users Outside Proposed Power Generation Facility Boundary	~~1.22E-03~~ 0.17	~~1.22E-03~~ 0.028	~~1.23E-02~~ 0.26	~~1.23E-02~~	1.00	NO

Note:

~~a) The HIC and HIA values are the highest values of any receptors outside the landfill boundary. Since the values are already below the significance threshold of 1.00, no further analysis was conducted to obtain readings at the nearest residential or worker receptors.~~

Note: The cancer risk, chronic health index, chronic 8-hour health index, and acute health index values of the proposed Project which were modeled pursuant with Office of Environmental Health Hazard Assessment (OEHHA) Guideline and SCAQMD Risk Assessment Procedures for Rule 1401, 1401.1 and 212. are the highest values of any receptors outside the existing landfill property boundary and power generation facility. Analysis assumes RICEs, regenerative flare, and waste flares combusting 135.26 MMBtu/hr LFG). Since the values are already below the SCAQMD significance threshold of 10E-06 for cancer risk and 1.00 for the health index, no further analysis was conducted to obtain readings at the nearest residential or worker receptors

Data source: Health risk assessment conducted in ~~2017~~ 2021, model output using HARP2

As shown in **Table 20** and **21**, MICR, HIC, and HIA values of the proposed Project are below the significance thresholds.

4.2.4.12 Cancer Burden

Pursuant to OEHHA Guideline and SCAQMD policy, if MICR at a representative receptor location is greater than 1.00E-06, an additional analysis must be conducted to determine Cancer Burden (the number of people exposed to a risk of 1.00E-6). As shown in the **Table 20**, the MICR for the proposed Project, even when considering a future recreation use after landfill closure pursuant with requirements of the JPA is less than 1.00E-06; therefore, a Cancer Burden analysis is not required.

Based on the results of health risk assessment shown in **Table 20** and **21**, the toxic emissions from the proposed Project, even when considering a future recreation use after landfill closure pursuant with requirements of the JPA will not expose the nearest sensitive receptors to significance cancer risks, non-cancer acute risks, and non-cancer chronic risks. Additional mitigation measures are not required.

Threshold: Expose sensitive receptors to substantial pollutant concentrations?

Mitigation Measures

No mitigation measures are required.

4.2.4.13 Carbon Monoxide Hotspots

The proposed Project would include a similar number of vehicle trips that already exists as part of operation and maintenance of the LFG collection, conditioning, and flaring operations. Because the proposed Project would not result in an increase in operation phase vehicle trips, there would be no increase in vehicle CO emissions that would have the potential to result in a carbon monoxide. CO emissions during construction activity will be below SCAQMD localized significant impact thresholds. As a result, the potential impact relative to CO hotspots of construction and operation of the Project would not be significant

Mitigation Measures

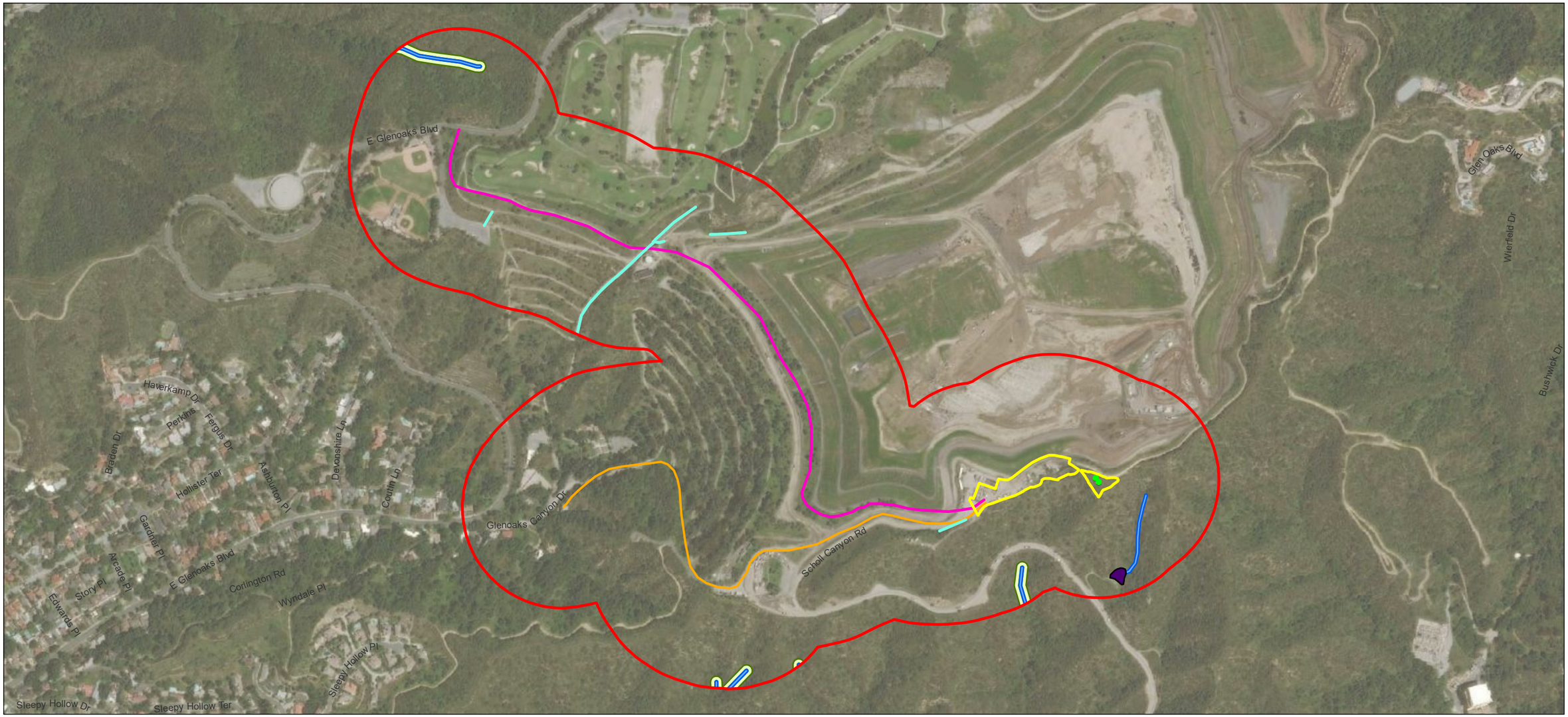
No mitigation measures are required.

4.2.5 Cumulative Impacts

One local project has been determined to be a related project as defined by CEQA Guidelines 15130(b). The Grayson Repowering Project, which is located approximately five miles west of the SCLF. Extensive analyses of each project were conducted to assess the significance of air quality, public health and greenhouse gas impacts. Each project was independently determined to present impacts that are below significance thresholds.

The Grayson Repowering Project EIR is being amended to reflect an alternative project design, including a smaller fossil fuel -based generating platform that will be augmented with distributed renewable generation and a minimum of 50 MW of battery storage capacity. The environmental impacts of the alternative design of the Grayson Repowering Project are also expected to be less than significant. Given the distance between the two projects and level of impact from each project, it is reasonable to conclude that the combined impact of the two projects would also be less than significant.

As shown in the analysis above, the Project's potential air quality impacts, even when considering a future recreation use after landfill closure pursuant with requirements of the JPA would be less than significant.



Biological Study Area

Potentially Jurisdictional Drainage Features

Project Components

Proposed Power Plant Facility Boundary

Proposed Water Pipeline

Proposed Gas Pipeline

New Water Tank

National Wetlands Inventory - Wetland

Freshwater Pond

Riverine

National Wetlands Inventory - Riparian

Forested/Shrub Riparian

0 600 1,200 Feet

(At original document size of 11x17)
1:7,200

N

Stantec

Project Location
Glendale, Ca

Prepared by DL on 2021-07-14
TR by SET on 2021-07-14
IR by SR on 2021-07-14

Client/Project
185804356

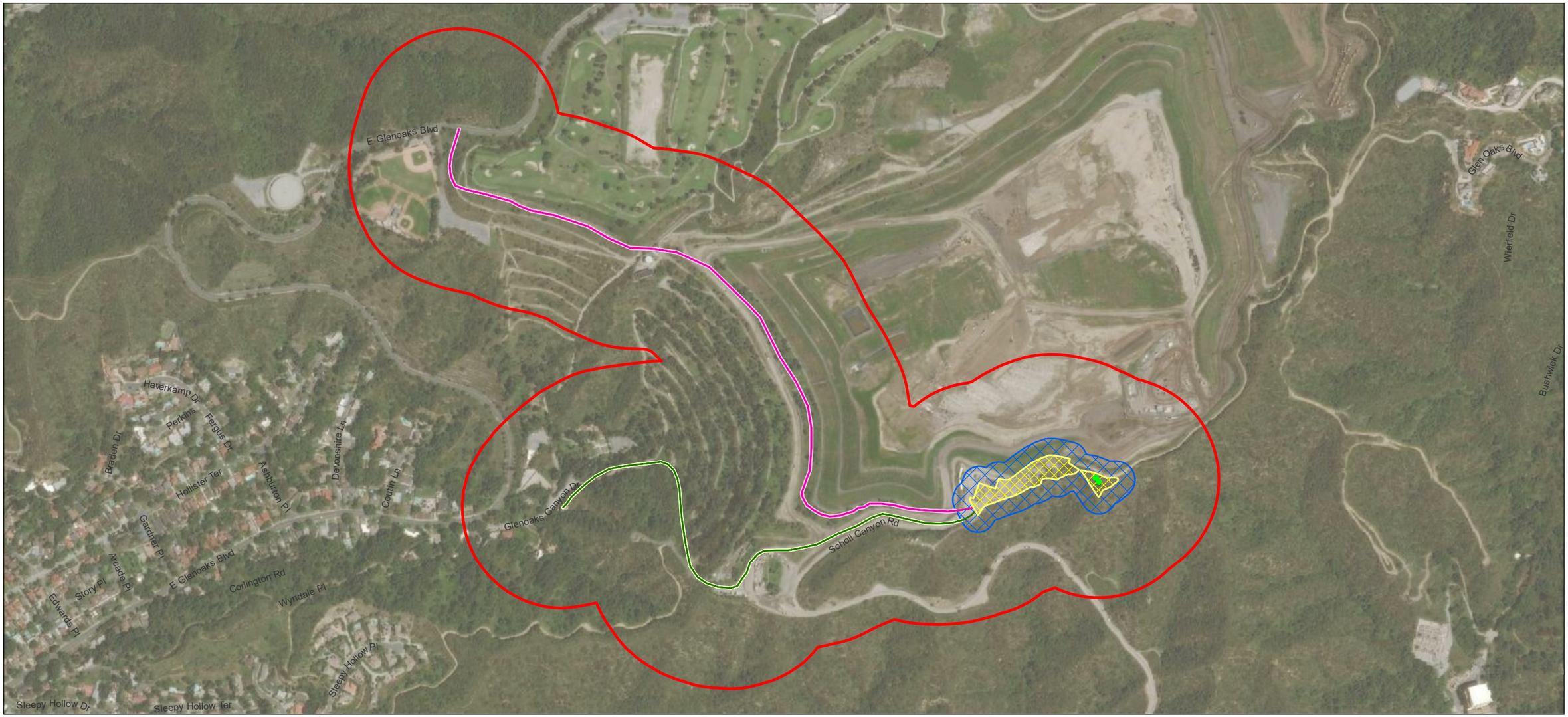
City of Glendale Water and Power
Biogas Renewable Generation Project
Environmental Impact Report

Figure No.
4.3-2

Title
National Wetlands Inventory

Notes
1. Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet
2. Background: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community
3. S=Data Source: Stantec, Wetlands and Riparian from National Wetlands Inventory 2020.

Disclaimer: This document has been prepared based on information provided by others as cited in the Notes section. Stantec has not verified the accuracy and/or completeness of this information and shall not be responsible for any errors or omissions which may be incorporated herein as a result. Stantec assumes no responsibility for data supplied in electronic format, and the recipient accepts full responsibility for verifying the accuracy and completeness of the data.



Biological Study Area

New Water Tank

Proposed Power Plant Facility Boundary (Permanent Impact)

Proposed Power Plant Facility 100ft Buffer For Fire Protection (Permanent Impact)

Proposed Water Pipeline (Permanent Impact)

Proposed Water Pipeline (Temporary Impact)

Proposed Natural Gas Pipeline (Permanent Impact)

Proposed Natural Gas Pipeline (Temporary Impact)

0 600 1,200 Feet

(At original document size of 11x17)
1:7,200

N

Stantec

Project Location
Glendale, Ca

Prepared by DL on 2021-07-14
TR by SET on 2021-07-14
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185804356

City of Glendale Water and Power
Biogas Renewable Generation Project
Environmental Impact Report

Figure No.
4.3-3

Title
Limits of Temporary and Permanent Impacts

Notes
1. Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet
2. Background: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

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Monitoring will occur continuously during initial ground disturbance for the duration of construction~~. Once initial ground disturbance is complete, monitoring will occur periodically during all construction~~ activities. Once initial ground disturbance is complete, monitoring will occur periodically during all construction activities within these areas. Activities related to the installation of the gas and water pipelines should be monitored daily for the duration of construction (not just initial ground disturbance). The qualified biologist(s) shall be present at all times during ground-disturbing activities immediately adjacent to, or within, habitat that supports populations of listed or special-status species. Any special-status plants shall be flagged for avoidance. Any special-status terrestrial species found within a Project impact area shall be relocated by the authorized biologist to suitable habitat outside the impact area; relocation will be guided by the species specific list (or plan) as described further below in this measure. Surveys for special-status species shall be conducted by the authorized biologist prior to the initiation of construction each day ~~during initial ground disturbance, and weekly thereafter~~ prior to Project construction activities. Pre-construction clearance surveys should be conducted within the entirety of Project site. If nesting birds are found during the pre-construction surveys, buffers shall be installed (as prescribed in Mitigation Measure BIO-5 Conduct Pre-construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures discussed below.

If, during construction, the biological monitor observes a dead or injured special-status wildlife species on the construction-site; the City of Glendale, CDFW, and USFWS (as appropriate) should be notified by the end of the work day or the following morning if the required agency office is closed. ~~a~~A written report shall be sent to the City of Glendale, CDFW, and USFWS (as appropriate) within ~~five~~ three calendar days. The report will include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Injured animals will be taken immediately to the nearest appropriate veterinary or wildlife rehabilitation facility. The biological monitor shall, immediately upon finding the remains or injured animal, coordinate with the onsite construction foreman to discuss the events that caused the mortality or injury, if known, and implement measures to prevent future incidents. Details of these measures shall be included with the report. Work in the immediate area may only resume once the proper notifications have been made and additional measures have been identified to prevent additional injury or death. Species remains shall be collected and frozen as soon as possible, and CDFW and USFWS, as appropriate, shall be contacted regarding ultimate disposal of the remains.

A qualified biologist should prepare a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas. The list (or plan) of protocols should be implemented during Project construction and activities/biological construction monitoring. The qualified biologist, in coordination or on behalf of the City, may consult with CDFW to prepare species-specific protocols for proper handling and relocation procedures.

BIO-4 Conduct Pre-construction Floristic Plant Surveys

The City shall conduct two appropriately timed floristic surveys, following current CDFW and CNPS protocols, within the Project impact areas and within a 100-foot buffer in the spring/summer prior to the start of construction. Upon completion of the surveys a detailed report will be prepared and provided to

Project activities that result in the degradation to habitat for or the loss of endangered, threatened, or other special-status species would be considered a significant adverse impact requiring mitigation.

Special Status Mammals

No special-status mammal species were detected within proposed Project impact areas. The proposed Project area and adjacent habitats have the potential to support a variety of special-status mammals including the American badger and the San Diego desert woodrat, both CDFW Species of Special Concern. Direct impacts to these species would include mechanical crushing by vehicles and construction equipment, trampling, and loss of habitat. Construction disturbance can also result in the flushing of small animals from refugia which increases the predation risk for small rodents. Potential indirect impacts include exposure to fugitive dust, alteration of soils, such as compaction, that could preclude burrowing, the spread of exotic weeds, and increased noise levels.

During O&M of the proposed Project, impacts to sensitive mammals would include increased human disturbance, exposure to fugitive dust, the spread of noxious weeds, and disruption of breeding or foraging activity due to routine inspection and maintenance activities. Weed abatement through herbicide application or mechanized tools could also affect mammal species.

Because the proposed Project would remove or disturb vegetation and these animals would be subject to mortality from the construction of the proposed Project, impacts to these species would be considered significant adverse effects requiring mitigation.

Mitigation Measures

BIO-1 Implement a Worker Environmental Education Program

BIO-2 Implement Best Management Practices (BMPs)

BIO-3 Implement Biological Construction Monitoring

BIO-5 Conduct Pre-construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures

If feasible, conduct initial vegetation removal and construction activities that generate substantial noise and/or dust outside of the recognized nesting bird season to minimize potential direct impacts to nesting birds. Text will also be included that recommends construction activities resulting in a significant increase in noise or dust, based on baseline levels, will be conducted outside of the nesting season to the extent feasible.

Prior to construction activities during the recognized nesting bird season (i.e., mobilization, staging, grading, or construction) the City of Glendale shall retain a qualified avian biologist to conduct pre-construction surveys for nesting birds within the recognized breeding season in all areas within 500 feet of all proposed Project components (i.e., pipelines, staging areas, and access road locations). Surveys for raptors shall be conducted for all areas from January 1 to August 15. The required survey dates may be modified based on local conditions, as determined by the qualified avian biologist, in



BIO-6 Conduct Surveys for Terrestrial Herpetofauna and Implement Monitoring, Avoidance, and Minimization Measures

Prior to ground disturbance or vegetation clearing at all Project locations, the City of Glendale shall retain a qualified biologist to conduct surveys for terrestrial herpetofauna where suitable habitat is present and directly impacted by construction vehicle access. Surveys should place an emphasis towards identifying any Species of Special Concern (SSC) including (but not limited to) the southern California legless lizard; California glossy snake; coastal whiptail; coast horned lizard; and San Diego desert woodrat. Focused surveys shall consist of a minimum of three daytime surveys and one nighttime survey within one week of vegetation clearing. The qualified biologist will be present full time during all vegetation removal activities immediately adjacent to or within habitat that supports terrestrial herpetofauna, and part time for all remaining activities. Surveys for terrestrial herpetofauna shall be conducted by the qualified biologist prior to the initiation of each day of vegetation removal activities in suitable habitat. Terrestrial herpetofauna found within the area of disturbance or potentially affected by the proposed Project will be relocated to the nearest suitable habitat that will not be affected by the proposed Project.

BIO-7A Conduct Pre-Construction Maternity Colony or Hibernaculum Surveys for Sensitive Bats

No more than 15 days prior to Project construction activities near trees, or which involve removal of trees or other structures, the City shall retain a qualified biologist who has a CDFW collection permit and a Memorandum of Understanding with CDFW allowing the biologist to handle bats. That biologist shall conduct pre-construction surveys for sensitive bats. Surveys shall also be conducted during the maternity season (1 March to 30 September) within 100 feet of Project activities.

If active maternity roosts or hibernacula are found, the structure, tree or tower occupied by the roost shall be avoided (i.e., not removed), if feasible; work shall not occur within 100 feet of or directly under or adjacent to an active roost and work shall not occur between 30 minutes before sunset and 30 minutes after sunrise. If avoidance of the maternity roost is not feasible, the biologist shall survey (through the use of radio telemetry or other CDFW methods) for nearby alternative bat maternity colony sites. If the biologist determines in consultation with the CDFG that there are alternative roost sites used by the maternity colony and young are not present then no further action is required, and it will not be necessary to provide alternate roosting habitat. If there are no alternative roosts sites used by the maternity colony, BIO-7B is required. If no active roosts are found, then no further action is required. If active maternity roosts are absent, but a hibernaculum (i.e., a non-maternity roost) is present, then BIO-7B is not necessary, but BIO-7C is required.

BIO-7B Provide Substitute Roosting Habitat for Bats



If a maternity roost will be impacted by the Project, and no alternative maternity roosts are in use near the site, substitute roosting habitat for the maternity colony shall be provided on, or in close proximity to, the Project site no less than three months prior to the eviction of the colony. Alternative roost sites will be constructed in accordance with the specific bat requirements in coordination with CDFW. By making the roosting habitat available prior to eviction (BIO-7C), the colony will have a better chance of finding and using the roost. Alternative roost sites must be of comparable size and proximal in location to the impacted colony. The CDFW shall also be notified of any hibernacula or active nurseries within the construction zone.

If construction of alternative roost sites is required, the biologist shall provide a written report, documenting the required coordination with CDFW as well as the location of roost sites. This report shall be provided to CDFW.

BIO-7C Exclude Bats Prior to Eviction from Roosts

If non-breeding bat hibernacula are found (for the duration of construction activities) in structures or trees scheduled to be removed, the individuals shall be safely evicted, under the direction of a qualified biologist, by opening the roosting area to allow airflow through the cavity or other means determined appropriate by the bat biologist (e.g., installation of one-way doors). In situations requiring one-way doors, a minimum of one week shall pass after doors are installed and temperatures should be sufficiently warm for bats to exit the roost because bats do not typically leave their roost daily during winter months in southern coastal California. This action should allow all bats to leave during the course of one week. Roosts that need to be removed in situations where, in the judgment of the qualified biologist, the use of one-way doors is not necessary shall first be disturbed by various means at the direction of the bat biologist at dusk to allow bats to escape during the darker hours, and the roost tree shall be removed or the grading shall occur the next day (i.e., there shall be no less or more than one night between initial disturbance and the grading or tree removal).

If an active maternity roost is located in an area to be impacted by the Project, and alternative roosting habitat is available, the demolition of the roost site must commence before maternity colonies form (i.e., prior to March 1st) or after young are flying (i.e., after July 31st) using the exclusion techniques described above.

Level of Significance After Mitigation

To reduce impacts to special-status wildlife, the City of Glendale would implement Mitigation Measures BIO-1 (Implement a Worker Environmental Education Program), BIO-2 (Implement Best Management Practices), BIO-3 (Implement Biological Construction Monitoring), BIO-5 (Conduct Pre-construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures), ~~and~~ BIO-6 (Conduct Surveys for Terrestrial Herpetofauna and Implement Monitoring, Avoidance, and Minimization Measures), BIO-7A (Conduct Pre-Construction Maternity Colony or Hibernaculum Surveys for Sensitive Bats), BIO-7B (Provide Substitute Roosting Habitat for Bats), and BIO-7C Exclude Bats Prior to Eviction from Roosts). These measures include worker education describing the sensitive biological resources that occur on the proposed Project site, implementation of BMPs to minimize and avoid impacts, conducting pre-construction nesting bird and herpetofauna surveys, and conducting biological monitoring during



Table 25 Proposed Project Impacts to Vegetation Communities and Land Cover Types

Vegetation Community / Land Cover Type		Total Acres in Survey Area		Project Impacts				
2019 Survey	2017 Survey	2019 Survey (Acres)	2017 Survey (Acres)	2019 Survey (Acres)*			2017 Survey (Acres)	
				Temp	Perm		Temp	Perm
					Power Plant, Water Tanks, and Pipeline	Fire/Brush Clearance		
Annual Brome Grassland	--	10.48	--	0.22	0.15	0.65	--	--
Black Sage Scrub	California Encelia-Black Sage Scrub	8.0	5.67	--	--		--	--
California Buckwheat Scrub	--	1.75	--	--	--		--	--
California Sagebrush Scrub	California Sagebrush Scrub	0.44	0.31	--	--		--	--
California Sagebrush-California Buckwheat Scrub	California Buckwheat Scrub	2.84	7.11	--	0.16	0.06	0.02	0.29
Chamise chaparral	Scrub Oak - Chamise Chaparral	4.82	2.40	--	--		--	--
Coast live oak woodland	Coast live oak woodland	2.95	1.3	0.00	--		--	--
Fountain Grass Swards	--	14.49	--	0.34	0.03		--	--
Laurel Sumac Scrub	Lauren Sumac Chamise Scrub	70.57	50	0.16	0.45	2.76	0.09	0.39
Developed / Disturbed	Cleared / Developed	~~87.18~~ 87.16	86.75	0.91	1.39	2.33	1.13	1.45
Ornamental Woodland	Ornamental/ Non- Native	31.75	39.14	0.42	~~0.03~~ 0.05		0.92	0.06
Total		**~~235.27~~ 235.25**	**192.68**	**2.06**	**~~8.01~~ 2.22**	**5.80**	**2.16**	**2.19**

*These acreages include impacts related to updated Fire Department brush clearance requirements not required as part of the 2017 impact acreage calculations.

Construction of the proposed Project would remove vegetation, alter soil conditions, and potentially result in the loss of native seed banks. Construction activities could also result in the spread of noxious weeds

within the proposed Project site and adjacent habitats. Vehicle travel on access roads and paved streets could result in increased fugitive dust to native vegetation in adjacent areas. Wind-blown dust can degrade soils and vegetation over a wide area (Okin et al., 2001). Dust can have deleterious physiological effects on plants and may affect their productivity and nutritional qualities (Sharifi et al., 1997). Fugitive dust can kill plants by burial and abrasion, interrupt natural processes of nutrient accumulation, and allow the loss of soil resources. The destruction of plants and soil crusts by windblown dust exacerbates the erodibility of soil and accelerates the loss of nutrients (Okin et al., 2001).

Operational impacts would occur during routine inspection and maintenance of the proposed Project components. These impacts could include trampling or crushing of native vegetation by foot traffic, alterations in topography and hydrology, increased erosion and sedimentation, and the introduction of non-native, invasive plants due to increased human presence on foot or equipment.

While not considered a sensitive community for the purposes of CEQA, coast live oak and scrub oak are protected under the City of Glendale's "Indigenous Tree Ordinance." Depending on the dbh of the impacted trees a permit and replacement trees may be required. The City of Glendale would be required to seek a permit for impacts to protected trees to comply with the "Indigenous Tree Ordinance."

Because of their suitability to support several special-status species, the loss of and impacts to native habitat associated with the proposed Project would be considered a significant adverse impact for which mitigation would be required (Class II).

Mitigation Measures

BIO-1 Implement a Worker Environmental Education Program

BIO-2 Implement Best Management Practices (BMPs)

BIO-3 Implement Biological Construction Monitoring

~~BIO-~~7 BIO -8 Vegetation Removal and Replacement

Construction activities shall be done in such a manner as to minimize the removal of native vegetation. If impacts to native vegetation removal cannot be avoided, all temporarily impacted plant communities shall be restored at a mitigation ratio of 1:1; the Project will temporarily impact 0.16 acres of California sagebrush-California buckwheat scrub and 0.45 acres of laurel sumac scrub. ~~permanent impacts to native communities shall be restored/mitigated at a 2:1 ratio. Sensitive communities, including jurisdictional wetlands, shall be restored/replaced at a mitigation ration of 2:1 for all temporary and 3:1 for all permanent impacts.~~ The compensation for the permanent loss of habitats may be achieved either by a) on-site habitat creation or enhancement of impacted communities with similar species compositions to those present prior to construction, b) off-site creation or enhancement of ~~California sycamore woodlands and southern riparian scrub~~ laurel sumac scrub and California sagebrush-California buckwheat scrub communities, or c) participation in an established mitigation bank program. Permanent impacts to native communities shall be restored/mitigated at a 3:1 ratio for on or off-site habitat restoration/creation or at a 2:1 ratio for participation in an established mitigation banking program; the Project will permanently

impact 0.06 acres of California sagebrush-California buckwheat scrub and 2.76 acres of laurel sumac scrub.

~~Prior to the removal of native vegetation, if on or off-site mitigation is required, a Habitat Mitigation and Monitoring Plan shall be prepared that will guide all restoration and monitoring activities. This plan shall include, at a minimum, the~~ following:

Prior to the start of any project related activities (including removal of native vegetation), if on or off-site mitigation is required, an ecosystem-based Habitat Mitigation and Monitoring Plan shall be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques that will guide all restoration and monitoring activities. This plan shall include, at a minimum, the following:

- Provide the total acreage of unique sensitive vegetation communities impacted, and abundance, density, and cover of each plant species and vegetation layer impacted (i.e. ground cover, forbs, subshrub, shrub, and trees).
- Provide the specific location of on- and/or off-site mitigation area(s) and a science based factual discussion as to why the mitigation area(s) is appropriate for mitigating Project-related impacts. Describe the environmental features (i.e., soils, slope, existing vegetation, hydrology) that would suggest the mitigation area(s) can support the vegetation and wildlife impacted by Project activities.
- Provide a vegetation survey conducted at a reference site containing the vegetation communities being mitigated, with as good or better quality habitat, to document the density, abundance, diversity, and percent cover for each species by vegetation layer.
- A schematic depicting the mitigation area
- Proposed species list for creation/enhancement~~;~~ A plant palette shall consist of species that are diverse with respect to growing duration (annual, perennial), life form (grasses, shrubs, trees, vines), and structure (ground cover, shrubs, tree canopy) that form the vegetation alliance that is being mitigated.
- Planting/seeding methodology~~;~~ (e.g., sources of local propagules, container sizes, and seeding rates).
- Planting schedule.
- Irrigation plan~~;~~.
- Weeding schedule~~;~~ and invasive plant control methods that reduces or eliminates the use of chemicals.
- Success criteria~~;~~.
- Monitoring methodology and schedule~~; and~~ extended across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.
- Reporting requirements.
- Prior to any Project construction and activities, the perimeter of the 3.37 acres of laurel sumac scrub and California sagebrush-California buckwheat scrub be clearly delineated by temporary stakes, flags, or other clearly identifiable system. Fencing will be accompanied by signage. During WEAP, workers will be advised not to cut, clear, pull, or trample vegetation; toss or pile debris and garbage; or otherwise impact vegetation beyond the demarcated area. Temporary

fencing and signage should be maintained for the duration of the Project and removed after Project construction and activities are completed.

Level of Significance After Mitigation

Implementation of Mitigation Measures BIO-1 (*Implement a Worker Environmental Education Program*), BIO-2 (*Implement Best Management Practices*), BIO-3 (*Implement Biological Construction Monitoring*), and ~~BIO-7~~ BIO-8 (*Vegetation Removal and Replacement*) would minimize impacts to sensitive or protected communities. These measures include worker education describing the sensitive biological resources that occur on the proposed Project site, implementation of BMPs to minimize and avoid impacts, and conducting biological monitoring during ground- disturbing and other construction-related activities. Implementation of these mitigation measures would reduce impacts to listed or special-status plants to a less than significant level.

Threshold: Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

A formal delineation of jurisdictional wetlands, other "waters of the U.S.," waters of the State, and CDFW jurisdictional waters was not conducted; however, during reconnaissance level surveys potentially jurisdictional features were mapped and are presented on Figure 3 in Appendix C of this document. The project has been designed such that all gas and water pipelines would be installed overhead or below all potentially jurisdictional features.

Should they occur, direct impacts to federal non-wetland Waters of the U.S. and CDFW jurisdictional waters could include the removal of native vegetation, the discharge of fill, degradation of water quality, and increased erosion and sediment transport. Potential indirect impacts could include alterations to the existing topographical and hydrological conditions and the introduction of non-native, invasive plant species. Operational impacts to wetland habitats would be similar to direct and potential indirect impacts.

As required by law, the City would comply with the regulations regarding conducting Project activities in water courses and habitats under the jurisdiction of the State and federal government. Therefore, the City would obtain required permits pursuant to Section 401 and 404 of the CWA, the State Porter- Cologne Act, and Fish and Game Code Section 1605. Due to the importance of jurisdictional habitats and ephemeral/perennial drainages and their suitability to support special-status species, the loss of these habitats associated with the proposed Project would be considered a significant adverse impact requiring mitigation.

Mitigation Measures

BIO-1 Implement a Worker Environmental Education Program

BIO-2 Implement Best Management Practices (BMPs)

BIO-3 Implement Biological Construction Monitoring

Level of Significance After Mitigation

emissions to be amortized over a 30-year project lifespan. For this analysis, however, construction emissions reflect the project total, without amortization. GHG due to Project operations include emissions from both stationary and mobile sources.

4.6.4 Project Impacts

Threshold: Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

The proposed Project will emit GHG emissions from construction and operation activities. The construction GHG emissions would be generated primarily by the off-road equipment and on-road vehicles.

During the operations phase of the proposed Project, the electrical generation units, regeneration flare, and waste flares will be the primary contributor of GHG emissions. ~~LFG will be transferred from the existing flare operations to electrical generating units with the exception of periods when the system is under maintenance or repair. During these periods, the existing flares will serve as backup devices.~~ Facility occupancy related activity, such as water usage, power usage, and vehicles will also generate a small level of GHG emissions.

CalEEMod was used to calculate GHG emissions from the construction and facility occupancy activities. USEPA emission factors and an estimated LFG production rate of ~~5,000~~ 6,200 scfm were used to calculate GHG emissions from the proposed electrical generating equipment. CalEEMod results are provided in Appendix B.

~~Additionally, natural gas (NG) may be utilized to augment ignition when the LFG heating value is unusually low. GHG emissions from NG combustion were calculated.~~ **Tables 29** and **30** summarizes the potential net increase of GHG emissions that could occur during construction and operation of the proposed Project. A GHG emission inventory is provided in Appendix F.

Table 29 Net Increase of GHG Emissions from the Construction Activities

Device/Activity	CO_2 (MT/year)	CH_4 (MT/year)	N_2O (MT/year)	Total CO_2e (MT/year)
Construction	257	0.06	0	258

Table 30 Net Increase of GHG Emissions from the Operation Activities

Device/Activity	CO_2 (MT/year)	CH_4 (MT/year)	N_2O (MT/year)	Total CO_2e (MT/year)
Proposed ~~Engines~~ Project	~~48,146~~ 61,696	~~2.76~~ 3.79	~~0.53~~ 0.75	~~48,375~~ 62,013
Occupants	49	~~0.13~~ 0.12	~~1.29×10^{-3}~~ 0.001	52
			Total GHG Emissions:	~~48,427~~ 62,065
			Total Baseline GHG Emissions:	~~43,621~~ 62,013
			Net Increase of GHG Emissions:	~~4,806~~ 52

Level of Significance After Mitigation

As discussed above, baseline wildfire risks would be not be exacerbated and significant risk of loss, injury or death involving wildland fires was unlikely to occur during construction of the proposed Project. Project design features, existing regulatory requirements, and implementation of Mitigation Measures FIRE-1, FIRE-2, and FIRE-3 would serve to ensure that the operation of the proposed Project would not result in an increased baseline risk exposure. Therefore, impacts would be less than significant.

4.7.4.6 Operation

Described in detail in Section 4.14 (Wildfire), operational impacts associated with exacerbated wildfire risks and significant risk of loss, injury or death involving wildland fires could occur if operation of the proposed Project would result in an increased baseline wildfire risk or generate increased unmitigated sources of ignition. Significant risks would be generated only if operation of the proposed Project were to result in a wildland fire which originated within the proposed Project, and then spread offsite into the surrounding San Rafael Hills. The Project does not propose any habitable structures or residences which could become threatened by fires originating onsite during operation of the proposed Project.

As discussed in Section 2.7 (Project Operations), the proposed Project would be operated adjacent to the existing LFG collection and LFG flaring systems. The blowers and flares would remain pursuant to the existing SCAQMD permit. After the proposed Project is in operation, the flares would only be used as required during power generation facility maintenance or in the unlikely event that there is excess LFG being produced that cannot be used for generating electricity. Fuel (vegetation) management would occur regularly in accordance with regulations. The electrical generating combustion engines would be operated within fire protection enclosures with fire suppression systems, and electrical equipment would be operated in enclosures insulated with an inert gas, thereby further reducing potential sources of ignition. The existing flares would remain and do not represent a new source of potential wildfire or an increase above the baseline wildfire risk. Discussed in Section 4.14.4.2, implementation of Mitigation Measure ~~FIRE-4~~ FIRE-1 ~~(Firefighting Tools)~~ (Fire Protection Plan) would ensure that an abundance of fire protection capabilities remain on-site at all times and that on-site personnel can immediately respond in the event of an unforeseen circumstance. Implementation of Mitigation Measure FIRE-1 is also warranted, as it would also further reduce risk of wildfire during Project operation.

Mitigation Measures

FIRE-1: Fire Protection Plan

~~*FIRE-4: Firefighting Tools*~~

Level of Significance After Mitigation

As discussed above, baseline wildfire risks would be not be exacerbated and significant risk of loss, injury or death involving wildland fires was unlikely to occur during operation of the proposed Project. Project design features, existing regulatory requirements, and implementation of Mitigation Measure~~s~~ FIRE-1 ~~and FIRE-4~~ would serve to ensure that the operation of the proposed Project would not result in an increased baseline risk exposure. Therefore, impacts would be less than significant.

Table 55 Comparison of Alternatives

		Alternative 1 No Project	Alternative 2 Convert Landfill Gas to Natural Gas	Alternative 3 Convert Landfill Gas to Liquid Natural Gas	Alternative 4 Locate Engine Generators at an Another Location
Ability to Meet Project Objective					
Would the alternative provide beneficial use of naturally occurring LFG?		No	Yes	Yes	Yes
Environmental Factor	**Project Impacts**	**Comparison of Potential Environmental Impacts to Project**			
Aesthetics	Less than Significant Impact	Less	Less	Greater	Less
Agriculture & Forestry Resources	No Impact	Similar	Similar	Similar	Similar
Air Quality	Less than Significant Impact	Less	Less	Less	Greater
Biological Resources	Less than Significant Impact with Mitigation	Less	Similar	Greater	Less
Cultural Resources	No Impact	Similar	Similar	Similar	Similar
Energy	Less than Significant Impact	Greater	Greater	Greater	Greater
Geology & Soils	Less than Significant Impact	Less	Greater	Greater	Similar
Greenhouse Gas Emissions	Less than Significant Impact	Greater	Less	Less	Greater
Hazards & Hazardous Materials	Less than Significant Impact	Less	Greater	Greater	Greater
Hydrology & Water Quality	Less than Significant Impact	Less	Greater	Greater	Similar
Land Use and Planning	Less than Significant Impact	Less	Greater	Greater	Less
Mineral Resources	No Impact	Similar	Similar	Similar	Similar
Noise	Less than Significant Impact	Less	Less	Similar	Greater
Population & Housing	No Impact	Similar	Similar	Similar	Similar
Public Services	No Impact	Similar	Similar	Similar	Similar
Recreation	No Impact	Similar	Similar	Similar	Similar
Transportation and Traffic	Less than Significant Impact	Less	Greater	~~Similar~~ Greater	Similar
Tribal Cultural Resources	Less than Significant Impact	Similar	Similar	Similar	Similar

		Alternative 1 No Project	Alternative 2 Convert Landfill Gas to Natural Gas	Alternative 3 Convert Landfill Gas to Liquid Natural Gas	Alternative 4 Locate Engine Generators at an Another Location
Utilities and Service Systems	Less than Significant Impact	Similar	Similar	Similar	Similar
Wildfire	Less than Significant Impact with Mitigation	Similar	Less	Greater	Less

5.6.6 Identification of the Environmentally Superior Alternative

CEQA requires that an EIR identify the environmentally superior alternative(s) of a project other than the proposed project or the "no project" alternative (CEQA Guidelines Section 15126.6 (e)(2)) if the no project alternative is the environmental superior. As stated at the beginning of this chapter, the purpose of this alternatives analysis is to consider a reasonable range of alternatives that could feasibly attain the basic project objective and avoid or substantially lessen significant project impacts.

The No Project Alternative would not satisfactorily meet the proposed Project objective.

As shown above in **Table 55**, the proposed Project, prior to incorporating mitigation, has the potential to significantly impact biological resources and wildfire. Of the alternatives considered in this evaluation, Alternative 4 is the only alternative that would reduce or avoid the potentially significant environmental effects of the proposed Project in the areas of biological resources and wildfire. However, placing the engine generators at Grayson Power Plant and significantly closer to sensitive and residential receptors would increase health risks and noise levels compared to the proposed Project. Additionally, an increase in energy use, indirect greenhouse gas emissions, and risk of upset/hazards from continued use of the SCLF to Grayson Power Plant pipeline would result compared to the proposed Project.

Alternative 2 would have incrementally less impacts to five environmental factors and incrementally greater impacts to six environmental factors compared to the proposed Project. Alternative 3 would have incrementally greater impacts to ~~eight~~ nine environmental factors and incrementally less impacts to two environmental factors when compared to the proposed Project. Alternative 4 would have incrementally greater impacts to five environmental factors and incrementally less impacts to four environmental factors when compared to the proposed Project.

As a result of this analysis, Alternative 2 is the environmentally superior alternative because it would reduce more proposed Project impacts when compared to the other alternatives. These include reductions in impacts to aesthetics, air quality, noise, greenhouse gas emissions and wildfire risk. Alternative 2 impacts on biological resources is similar to the proposed Project. Alternative 2 decreases more impacts compared to the proposed Project and also when compared to the other alternatives. Alternative 4 would have greater impacts on greenhouse gas emissions, air quality and noise in closer proximity to residential uses and sensitive receptors when compared to the proposed Project and to



7.0 REFERENCES

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9.0 RESPONSE TO COMMENTS

9.1 SUMMARY OF WRITTEN COMMENTS RECEIVED DURING THE PUBLIC REVIEW PROCESS FOR THE DRAFT EIR

The City as Lead Agency has prepared responses to comments received during public review of the Draft Environmental Impact Report (Draft EIR) pursuant to (Pub Res C section 21091(d); 14 Cal Code Regs section 15088. The responses to each comment, and where appropriate, provides information that amplifies and or clarifies information contained in the Draft EIR.

All written comments and responses to those comments on the Draft EIR received during the public review period (July 1, 2020, through September 30, 2020) are included in this section. The comment letters are all provided at the end of this section, followed by responses to all the comments. Comment letters were received from individual agencies, businesses, groups, organizations, and members of the general public. Comment letters are numbered in order of the date received. For example, the first comment letter received on July 9, 2020, is identified as L1. Separate comments within each comment letter are each assigned a number code; for example, L1-1, means letter number one, comment number one, etc. When the same comment is made by multiple parties, the response is provided following the first iteration of the comment, and all other same or similar comments that follow refer back to the initial response to the comment.

Comments received on the Draft EIR were reviewed to determine whether there is substantial disagreement about the potential significance of impacts. Any issues raised concerning potentially significant impacts were reviewed, addressed, and clarified.

Written comments received from State Agencies: 2

Written comments received from Regional and Local Agencies: 6

Written comments received from Interest Groups: 8

Written comments received from the Members of the General Public: 142

Table 9-1 Comment Letters

Letter ID	Name	Date
L1	Bret Marnell	7/9/2020
L2	Carolyn Howard-Johnson	7/9/2020
L3	Dan Petroff	7/9/2020
L4	Jake Katz	7/9/2020
L5	Ken Grayson	7/9/2020
L6	Romeo Balina	7/9/2020

RESPONSE TO COMMENTS

Letter ID	Name	Date
L7	Roberto Melendez	7/31/2020
L8	Bill Markis	8/1/2020
L9	Nancy and Dan Wall	8/5/2020
L10	Fred Wallingford	8/9/2020
L11	Jay Jen Mimi Sam and Ozzie Duplass	8/10/2020
L12	Kit Cole	8/12/2020
L13	Ken Salter	8/18/2020
L14	Mona Saba Valeriano	8/19/2020
L15	WM Johnson	8/19/2020
L16	Elisa Foster	8/22/2020
L17	Stephanie Chan	8/22/2020
L18	County of Los Angeles Fire Department	8/25/2020
L19	Joe Valeriano	8/29/2020
L20	Susan Hunt	8/30/2020
L21	Amy G. Koss	8/31/2020
L22	Janise and Eduardo Escobar	8/31/2020
L23	Janise and Eduardo Escobar	8/31/2020
L24	Philip Lee	8/31/2020
L25	Stephanie Schus Russin	8/31/2020
L26	Becky Newman	9/1/2020
L27	Department of Resources Recycling and Recovery (CalRecycle)	9/1/2020
L28	Larry and Laurel Haltum	9/1/2020
L29	Marie-Ange Vuillemin	9/1/2020
L30	Randy Glass	9/1/2020
L31	Gina Esposito	9/2/2020
L32	Christine Holland	9/3/2020
L33	Elizabeth Park	9/3/2020
L34	Jaime Borenstein	9/3/2020
L35	Karen King	9/3/2020
L36	Karen King	9/3/2020
L37	Gregg and Summer Wiele	9/4/2020
L38	Gregg, Summer, and Brooklyn Wiele	9/4/2020
L39	Donielle Lemone	9/5/2020
L40	Marwan and Amy Ataya	9/6/2020
L41	Priscila Kasha	9/6/2020
L42	Wyndham Chow	9/6/2020
L43	Emily Koss	9/7/2020

RESPONSE TO COMMENTS

Letter ID	Name	Date
L44	Marguerita Drew	9/7/2020
L45	Aida Galusian	9/8/2020
L46	Orbel Minassian	9/8/2020
L47	Sharice B. Marootian	9/8/2020
L48	Talin Minassian	9/8/2020
L49	Teni Shahnazarian	9/8/2020
L50	Erika Kraetsch	9/9/2020
L51	Kate DiRienzo-Payne	9/9/2020
L52	Angela Cohen	9/10/2020
L53	Allen St. John	9/10/2020
L54	Ann Reed	9/10/2020
L55	Brian Newlin	9/10/2020
L56	Elan Borenstein	9/10/2020
L57	Gary and Cheryl Hannah	9/10/2020
L58	Isabella Meyer	9/10/2020
L59	Jamie Kellum	9/10/2020
L60	John and Caroline Weiner	9/10/2020
L61	Larry Moorehouse	9/10/2020
L62	Max and Lucilla Denuna	9/10/2020
L63	Valerie D.	9/10/2020
L64	Shackeh Mastian	9/11/2020
L65	Bethsaida (Betsy) Castillo-Cifuentes	9/14/2020
L66	Claudi Sysock	9/14/2020
L67	E. Nevins	9/14/2020
L68	Ferrari	9/14/2020
L69	Flora Corin	9/14/2020
L70	Frances F. Coburn	9/14/2020
L71	Monica Lago-Kaytis	9/14/2020
L72	Omar Mauricio Cifuentes	9/14/2020
L73	Dora Herrera	9/16/2020
L74	Nancy Wise	9/16/2020
L75	Rafael Hernandez	9/16/2020
L76	Randall Wise	9/16/2020
L77	Richard Espinosa	9/16/2020
L78	Shirley Woo	9/16/2020
L79	Cindy Swensen	9/17/2020
L80	Michael Mallory	9/19/2020

Letter ID	Name	Date
L81	Richard Schmittdiel	9/21/2020
L82	Joan Morris	9/22/2020
L83	Amaly Avakian	9/23/2020
L84	Coalition for Scholl Landfill Alternatives (CSLA)	9/23/2020
L85	Renee Holt	9/23/2020
L86	Sharon McDonald	9/23/2020
L87	Alice Ryu	9/24/2020
L88	Joan Morris	9/24/2020
L89	Linda Goodman Pillsbury	9/24/2020
L90	Randall and Rowena Abarro	9/24/2020
L91	Sylvia Denlinger	9/24/2020
L92	Virginia L Melin	9/24/2020
L93	Bill Fritz	9/25/2020
L94	City of Los Angeles Sanitation & Environment (LASAN)	9/25/2020
L95	Los Angeles City Council District 14	9/25/2020
L96	David Eder	9/25/2020
L97	Hassan Rad	9/25/2020
L98	Individual	9/25/2020
L99	Kim Turner	9/25/2020
L100	Lynn Woods	9/25/2020
L101	Mary Fischer	9/25/2020
L102	Melissa Estrada	9/25/2020
L103	Susan Leising	9/25/2020
L104	Claudia Puig	9/26/2020
L105	Madeline Wills	9/26/2020
L106	Cyndi Otteson	9/27/2020
L107	Dierdre Wills	9/27/2020
L108	Myanna Dellinger	9/27/2020
L109	Allan Herbert	9/28/2020
L110	Glenoaks Canyon Homeowners Association (GOCHA)	9/28/2020
L110-A	Glenoaks Canyon Scholl Canyon Landfill Work Group	9/28/2020
L110-B	Soil Water Air Protection Enterprise (SWAPE)	9/28/2020
L111	Kelly, Robert, Graham and Gabriel Scherer	9/28/2020
L112	Liz Amsden	9/28/2020
L113	Mary Fischer	9/28/2020
L114	Rona Compton	9/28/2020
L115	Tobin Wills	9/28/2020

RESPONSE TO COMMENTS

Letter ID	Name	Date
L116	Audry Zarokian	9/29/2020
L117	California Department of Fish and Wildlife (CDFW)	9/29/2020
L117-A	California Department of Fish and Wildlife (CDFW)	9/29/2020
L118	Glenoaks Canyon Homeowners Association (GOCHA)	9/29/2020
L119	Jackie Gish	9/29/2020
L120	Justin King	9/29/2020
L121	Miri Hindes	9/29/2020
L122	Scott Freudenberg	9/29/2020
L123	Shanah Blevins	9/29/2020
L124	Spencer Wright	9/29/2020
L125	Bonnie Voland	9/30/2020
L126	Chris Hulen	9/30/2020
L127	East Area Progressive Democrats	9/30/2020
L128	Edmund H. Lew	9/30/2020
L129	Eileen Hatrick	9/30/2020
L130	Gustavo Moreno	9/30/2020
L131	Gustavo Moreno	9/30/2020
L132	Jack Walworth and Dorothy Low	9/30/2020
L133	Jennifer Wright	9/30/2020
L134	Judy Gate	9/30/2020
L135	Koreen A. Cea	9/30/2020
L136	LA River Communities for Environmental Equity	9/30/2020
L137	Linda Vista-Annandale Association	9/30/2020
L138	Liuba Ruiz	9/30/2020
L139	Los Angeles County Public Works	9/30/2020
L140	Matt Bissonnette	9/30/2020
L141	Miri Hindes	9/30/2020
L142	Mitchell Rubinstein	9/30/2020
L143	Councilmember-elect Kevin de León	9/30/2020
L144	Patricia	9/30/2020
L145	Rebecca Addelman	9/30/2020
L146	Robinson Wills	9/30/2020
L147	Sergio Keusayan	9/30/2020
L148	South Coast Air Quality Monitoring District (SCAQMD)	9/30/2020
L148-A	South Coast Air Quality Monitoring District (SCAQMD)	9/30/2020
L148-B	South Coast Air Quality Monitoring District (SCAQMD)	10/17/2017
L149	Susan Harris	9/30/2020

Letter ID	Name	Date
L150	Teresa	9/30/2020
L151	Glendale Environmental Coalition and Sierra Club	10/1/2020
L152	Mark Alan Rothenberg	10/1/2020
L153	Nicole and Brian McGaffey	10/1/2020
L154	Raymond Cho	10/1/2020
L155	The Eagle Rock Association (TERA)	10/1/2020
L156	Walt Kasha	10/5/2020
L157	Armen and Chantiel M.	9/12/2020
L158	Hilda L. Solis, County of Los Angeles Board of Supervisors, First District, received March 3 , 2021	3/3/2021 (after close of public comment period)

9.2 TOPICAL RESPONSES

A number of comments received on the Draft EIR focused on several recurring issues and topics associated with the Project and CEQA-related process and analysis. To consistently and efficiently respond to these recurring topical comments, topical responses (Topical Responses) were prepared, and individual comment letter responses may refer to such Topical Responses. The main issues warranting Topical Responses include the following:

Table 9-2 Topical Responses

Topics	Topical Response No.
Biogas Renewable Generation Project Relationship to Landfill Expansion and Landfill Closure	1
Biogas Renewable Generation Project Relationship to Grayson Repowering Project	2
Cumulative Impacts	3
Aesthetics	4
Air Quality / Greenhouse Gases	5
Geology and Soils	6
Hazards and Hazardous Materials	7
Noise and Traffic and Transportation	8
Wildfire	9
Project Alternatives	10

9.2.1 Topical Response 1: Biogas Renewable Generation Project Relationship to Landfill Expansion and Landfill Closure

Summary of Comments

Comments were received stating opposition to the proposed Scholl Canyon Landfill Expansion, as well as concerns that the Project would result in extending the operational life of the landfill. Comments inquired about the closure date of the landfill and when it is expected to reach full permitted capacity from currently projected annual fill volumes. In response to those comments and questions, the most current estimate anticipates landfill closure between 2025 and 2026, which is based on an independent life estimate by SCS Engineers (SCS, 2020). The comments also questioned if the anticipated closure date remains accurate, and if so, why should the area be further industrialized when the landfill property is expected to be redeveloped as open space or recreation use after landfill closure. Additional concerns were expressed that the Draft EIR does not evaluate impacts of the Project after landfill closure.

Response

In March 2014, a Draft Environmental Impact Report for the Scholl Canyon Landfill Expansion Project was circulated for public review; however, the Scholl Canyon Landfill Expansion Project EIR was never certified, and as provided in Section 3.2 of the Biogas Renewable Generation Project Draft EIR, the Landfill Expansion is no longer proposed, is no longer reasonably foreseeable and, as such, was not included in the cumulative impact analyses of the Project's Draft EIR.

The Project is proposed to be located in an area within the Scholl Canyon Landfill where landfill gas (LFG) is already collected and processed. According to the Scholl Canyon Landfill Joint Technical Document (JTD), the Scholl Canyon Landfill is permitted to receive up to 3,400 tons per day of non-hazardous municipal solid waste (JTD, 2016-2020). These limits are fixed and cannot be increased without a permit modification and CEQA review, neither of which are a part of this Project or this Draft EIR.

Regardless of landfill operation, expansion, or even closure, LFG would continue to be generated for many years by the natural decomposition process within the existing landfill, and LFG from this decomposition process will continue well after landfill closure. According to the Agency for Toxic Substances and Disease Registry, "more recently buried waste will produce more gas than older waste. Landfills usually produce appreciable amounts of gas within one to three years and peak gas production usually occurs five to seven years after wastes are dumped. Almost all gas is produced within 20 years after waste is dumped; however, small quantities of gas may continue to be emitted from a landfill for 50 or more years (ATSDR, 2001)." For example, LFG continues to be collected from the golf course side of the former Scholl Canyon Landfill after nearly 45 years after closure.

This Draft EIR evaluates the potential environmental impacts of constructing and operating a facility that is designed to combust the maximum volume of LFG estimated to be available from the landfill at any time during operation of the Project. As indicated above, based on an independent life estimate by SCS Engineers, the Scholl Canyon Landfill is currently estimated to reach capacity between 2025 and 2026

(SCS, 2020). A peak 135.26 MMBtu/hr LFG at a flow rate of 6,200 standard cubic feet per minute and 36 percent methane is expected to be produced and captured at Scholl Canyon Landfill during 2022. The volume and methane content of LFG would then decrease over time. Utilizing the peak volume and methane content of LFG as the basis for analyzing potential environmental impacts of the Project in this Draft EIR represents a conservative, worst-case scenario as less LFG would be expected to be produced, captured, and combusted in post-2022 Project operation years. The Project's reciprocating internal combustion engines do not require supplemental natural gas to operate when the LFG fuel source has an approximate methane content of 34 percent or more. When the methane content of the LFG fuel source is below approximately 34 percent, the reciprocating internal combustion engines require a two to three percent natural gas supplement. If required, natural gas makeup for the Project would be well below the 10 percent maximum natural gas makeup threshold applicable to determining Renewable Portfolio Standard eligibility for which the Project qualifies. Additionally, any natural gas makeup required during Project operation would be at a future date when the volume and methane content of LFG available at Scholl Canyon Landfill decreases over time. At no time during operation would the Project combust more than 135.26 MMBtu/hr LFG at a flow rate of 6,200 standard cubic feet per minute and 36 percent methane (even if natural gas makeup is part of this fuel stream).

According to Article IX, Section E, of the Joint Powers Agreement (JPA), "At such time as all sanitary landfill operations are completed by Los Angeles County Sanitation District at the Premises, and all areas have been surrendered by Los Angeles County Sanitation District to City for park, recreation, and roadway purposes, or for the implementation of solid waste management alternatives or other facilities related to the operation of a sanitary landfill, henceforth City shall be solely responsible for the control of LFG on the Premises, including the operation and maintenance of all necessary gas control equipment and facilities, and the construction of any additional facilities and/or implementation of any additional procedures according to accepted practice and as required by any regulatory authority having jurisdiction over the Premises (JPA, 1997)."

Once all sanitary landfill operations are completed, and after the Los Angeles County Sanitation District surrenders all areas to the City pursuant to the JPA, thereafter the JPA allows for the closed areas of the Scholl Canyon Landfill be converted to a park, recreation, and roadway purposes, or for the implementation of solid waste management alternatives or other facilities related to the operation of a sanitary landfill. The City shall be solely responsible for the control of LFG on the premises, including the operation and maintenance of all necessary gas control equipment and facilities, and the construction of any additional facilities and/or implementation of any additional procedures according to accepted practice and as required by any regulatory authority having jurisdiction over the premises.

This Project was designed, and equipment selected based on the amount of LFG expected to be produced for the anticipated remaining life of Scholl Canyon Landfill, and to maximize economic beneficial reuse of that LFG at Scholl Canyon Landfill, as opposed to burning off the LFG. The Project would be operated and maintained as long as the LFG can be used to generate electricity; after which time electrical generating equipment and equipment foundations would be removed. Any remaining LFG that continues to be produced after it is no longer economically feasible to combust the LFG in the reciprocating internal combustion engines to generate electricity would be managed through either the existing permitted flaring operation as appropriate, or through another technological solution that cannot

be predicted with reasonable certainty at this time, and is therefore excluded from the scope of this EIR. However, as the Project will likely continue to operate after landfill closure, the potential cumulative environmental impacts of operating the Project in close proximity to a post-landfill closure recreation or open space land use was analyzed in this Draft EIR. Please refer to Topical Responses No. 3, 5, and 8 for further information on potential cumulative impacts of the Project and future recreation use of the adjacent landfill area after closure. These analyses demonstrate the power generation and recreation land uses would not conflict with one another and potential cumulative impacts would be less than significant.

SCAQMD Rule 1150.1 requires that LFG be collected and properly managed in order to control emissions and odors, and to prevent public health and safety hazards. Combusting the LFG in the proposed engines provides environmental benefits over the use of the existing or new flares because combustion by the Project would yield approximately 12-megawatts of Renewable Portfolio Standard eligible electricity from an existing energy source that must be collected and managed, whereas flaring the LFG yields no renewable energy benefit whatsoever. In response to comments received regarding the installation of new flares instead of the proposed Project, please refer to Section 5.6.1 of the Draft EIR which discusses the analysis of Alternative 1, the No Project Alternative. The analyses in the Draft EIR concludes that the proposed Project, existing flares, or new flares which Los Angeles County Sanitation District would install to replace the existing flaring system, would all result in less than significant potential air quality and health risk impacts.

The Project has no relation to, or effect on, existing truck traffic associated with landfill operations because other than for construction and operation of the Project (which is analyzed in the Draft EIR), the Project will not increase the amount of trash hauled to Scholl Canyon Landfill for disposal. Specifically, the Project will generate six passenger car equivalent (PCE) trips per day during Project operations. During construction there will be up to 42 PCE trips per day on peak days, which would equate to an average of five trips per hour assuming an eight-hour workday during the four to five months of demolition, nine to ten months of site grading and construction, and two to three months for system start up. Please refer to Draft EIR Section 2.5 for the Project schedule.

The Project is a Separate Proposal and has Independent Utility from either the Grayson Power Plant Project or the now-defunct Scholl Canyon Landfill Expansion Project

According to *Laurel Heights Improvement Assn. v Regents of the University of California*, (1988) 47 Cal.3d 376, a project description must include all relevant parts of a project, including future expansion or later phases of the project that will foreseeably result from project approval. (Guidelines §15126). There is a two-pronged test to determine what is the “whole of the project”. The whole of the project consists of those activities that are, “(1) …a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.”

Here, the Project is not included in, contemplated by or reasonably foreseeable consequence of either a landfill expansion or landfill closure. The Project is not dependent on, and does not compel the expansion of, or prolonged operation of, the existing landfill. Landfill expansion is not a part of this Project.

Continued operation of the landfill and any expansion of the landfill in no way compels development of the Project because as previously described, the landfill will continue to generate LFG for many years to come, and that LFG is required to be captured and incinerated regardless of the status of the landfill. Neither a landfill expansion nor the Project is a reasonably foreseeable consequence of, or dependent on the other. There is already a SCAQMD permitted LFG capture and flaring system at Scholl Canyon Landfill that is capable of combusting any and all LFG generated by the landfill, however, energy generated by flaring the LFG is being lost when combusting the LFG can be put to a beneficial use that maximizes use of renewable resources.

The purpose of the Project is to:

- Provide beneficial use of naturally occurring LFG as fuel for power generating equipment;
- Utilize this renewable energy resource to help the City meet its California mandated Renewable Portfolio Standard;
- Use the existing transmission system to deliver generated electricity into the electrical grid without a need for transmission facility upgrades (or construction of new transmission facilities, which is also a cost savings);
- Build an on-site facility that will use the LFG as fuel; and
- Abandon the existing pipeline between the landfill and Grayson Power Plant that is currently not in use because LFG cannot be combusted at Grayson Power Plant (See Topical Response No. 2 in Section 1.1.1.2 below).

In addition, and as indicated above, CEQA review must include an analysis of the environmental effects of future expansion or other action if: "(1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects." *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 396. Absent these two circumstances, the future action need not be considered in the EIR for the Project.

As clarified in this Topical Response No. 1, the Project is not a reasonably foreseeable consequence of any landfill expansion and implementation of the Project will not induce or require prolonged operation or expansion of the landfill.

9.2.2 Topical Response 2: Biogas Renewable Generation Project Relationship to Grayson Repowering Project

Summary of Comments

Comments were received that the Project and the Grayson Repowering Project must be analyzed as one project. Comments were received that neither the Grayson Repowering Project Draft EIR nor the Project Draft EIR are properly accounting for greenhouse gas (GHG) emissions, increases of LFG combustion, nor the potential for even greater emissions if the Project is not built or if it fails to perform. Additional

comments were received questioning why the LFG cannot continue to be captured and piped to Grayson as it had in the past.

Summary of Responses

The Project is not a part of, the same as, or a direct or reasonably foreseeable consequence of, the Grayson Repowering Project because it will operate completely separate and independent from the Grayson Repowering Project. On that basis, the Project is considered to have independent utility. This means that regardless of whether the Grayson Repowering Project moves forward or not, the Project is independently viable and can be separately developed.

As noted previously in *Laurel Heights Improvement Assn. v Regents of the University of California,* (1988) 47 Cal.3d 376, a project description must include all relevant parts of a project, including future expansion or later phases of the project that will foreseeably result from project approval. (Guidelines §15126).

Here, the Project is not included in, contemplated by, or a reasonably foreseeable consequence of the Grayson Repowering Project; the Project will be constructed, permitted and operated completely interdependent from the Grayson (See below). The Project is designed to combust LFG and convert LFG into electrical energy which is fed into existing transmission lines at Scholl Canyon Landfill that connect with Glendale's existing electrical grid. LFG from Scholl Canyon Landfill, which is a natural consequence of the decomposition of landfill materials, is required to either be flared or captured and converted for beneficial reuse. Capturing and converting Scholl Canyon Landfill biogas is not a requirement of, or prerequisite to, the Grayson Repowering Project. The existing Grayson Plant and the proposed Grayson Repowering Project are not dependent on LFG from the Scholl Canyon Landfill. Similarly, the Project is not in any way dependent on the approval or implementation of the Grayson Repowering Project. The Project serves different purposes, operates independently from, and is implemented separately from the Grayson Repowering Project.

Specific Responses

Current and Proposed Use of Landfill Gas

When the prior Mitigated Negative Declaration (MND) report was being prepared for the Project in 2017, the majority of LFG produced by the Scholl Canyon Landfill was piped and combusted in existing boilers at Glendale Water and Power's (GWP's) Grayson Power Plant. Since April 2018, GWP discontinued combusting LFG in the boilers at the Grayson Power Plant because, among other reasons, the aging engines could not efficiently burn that gas. All LFG produced by the landfill is presently being combusted in the existing flare system at the Scholl Canyon Landfill.

According to the U.S. Department of Energy, U.S. Energy Information Administration, the five commonly used renewable energy sources include LFG and biogas, and municipal solid waste.[76] Landfills for municipal solid waste are a source of this energy from anaerobic bacteria—bacteria that can live without

[76] https://www.eia.gov/energyexplained/?page=renewable_home

the presence of free oxygen—living in landfills that decompose organic waste to produce biogas. Landfills typically control the naturally occurring methane gas emissions by burning or flaring methane gas or using it as an energy source. According to the U.S. Department of Energy, many landfills collect biogas, treat it, and then sell the methane, and some landfills use the methane gas to generate electricity.[77] This is important to consider because burning LFG, either in flares or in power generation equipment, is better environmentally because un-combusted methane is a potent greenhouse gas. Consequently, converting biogas to energy is not only better for the environment; it is a renewable energy source that helps the City meet the California Renewable Portfolio Standard mandate.

The Project would be located within the Scholl Canyon Landfill site where LFG is already currently being collected and processed. As part of the Project, the 5.5-mile pipeline connecting the landfill to the Grayson Power Plant would be decommissioned, purged, capped, and abandoned in place.

The Biogas Renewable Generation Project has Independent Utility from the Grayson Repowering Project

Under CEQA, a proposal that is related to another project, but has its own "independent utility" and is not necessary for that other project to proceed, need not be included as part of the project description, and may be reviewed in its own CEQA document, as a separate project. (See *Planning & Conservation League v. Castaic Lake Water Agency* (2009) 180 Cal.App.4th 210, 237). Accordingly, two projects may undergo separate environmental review when the projects serve different purposes or can be implemented independently. (See *Banning Ranch v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1223) (citing *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 99; *Sierra Club v. West Side Irrigation Dist. (*2005) 128 Cal.App.4th 690, 699; *Plan for Arcadia v. City Council of Arcadia* (1974) 42 Cal.App.3d, 712, 724)).

The Project is not dependent on the approval or implementation of the Grayson Repowering Project, nor is the Grayson Repowering Project dependent on the approval or implementation of the Project. The Project serves different purposes, operates independently from, and is implemented separately from the Grayson Repowering Project. Neither the Grayson Repowering Project nor the Project is a reasonably foreseeable consequence of the other. The LFG that is generated by Scholl Canyon Landfill is required to be captured and combusted. As stated, there is an existing SCAQMD permitted LFG capture and flaring system at Scholl Canyon Landfill that is capable of combusting any and all LFG generated by the landfill, but this LFG is not being combusted in a manner that will allow its beneficial use, especially now at a time when local renewable energy sources are vitally important.

The Grayson Repowering Project objectives are to:

[77] https://www.eia.gov/energyexplained/?page=biomass_biogas

- Integrate with local and remote distributed renewable energy resources to provide sufficient capacity and energy to ensure reliable service at all times for the City and to support the City's compliance with California's Renewable Portfolio Standards.

- Utilize current and reliable technology and control systems to provide reliable, cost effective, and flexible generation capacity for the City to serve its customer load.

- Provide a local generation resource sufficient to meet resource adequacy requirements, and the City's obligations within the Balancing Area 7 (BA) to balance load and resource at the interconnection with the BA, in accordance with industry standards including North American Electric Reliability Corporation (NERC) and Western Electricity Coordinating Council (WECC) requirements; thus, providing local reliability and contributing to grid stability within the Los Angeles Basin.

- Provide sufficient locally controlled generation to minimize the City's reliance on importing power from remote generation locations through a congested transmission grid system subject to planned and unplanned outages and reduces the power rating, making the delivery of energy to serve load less reliable than local generation.

- Replace the aged, unreliable, less efficient, high maintenance steam boilers with new, efficient, and less environmentally impactful generation technologies that meet SCAQMD's Rule 1304(a)(2) providing an offset exemption for an electric utility boiler replacement project.

- Locate the proposed Project at existing City property already permitted and used for generation to minimize the need for major infrastructure improvements such as fuel supply, water, wastewater, recycled water and transmission facilities, or the need to purchase additional property.

- Provide generation that is highly efficient to maintain reasonable cost of generation to minimize the impact on customer electric rates and help manage costs of delivering energy to the City's customers.

- Support water conservation efforts by eliminating the use of potable water for generation purposes.

- Reduce the per megawatt-hour (MWH) creation of emissions and consumption of water (See Final EIR, Grayson Repowering Project, Section 2.4).

In contrast, the Project objective is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate power.

Additional Project benefits include:

- Provide beneficial use of naturally occurring LFG as fuel for power generating equipment onsite.

- Utilize this renewable energy resource to help the City meet its California mandated Renewable Energy Portfolio.
- Use the existing transmission system to deliver generated electricity into the electrical grid without a need for transmission facility upgrades.
- Build an on-site power plant utilizing LFG as fuel, thus avoiding the need to transport LFG via pipeline and avoid the attendant need to inspect, maintain and operate additional infrastructure.
- Abandon the existing pipeline between the landfill and Grayson Power Plant, which would in turn allow the SCAQMD to make priority reserve offsets available and offsets would not have to be purchased on the open market.

As stated above, the objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate power.

The Grayson Repowering Project cannot currently, and will not be equipped to burn LFG because of the lack of space to accommodate additional infrastructure and additional significant air quality impacts, which do not make transporting LFG for combustion at the Grayson Power Plant a viable alternative (See Topical Response 10 – Alternatives).

Under the existing SCAQMD permit, the LFG must be flared at Scholl Canyon Landfill. Further, there is no requirement (SCAQMD or otherwise) that mandates LFG should or can only be flared; LFG can be burned and used to generate electricity as a byproduct of that combustion.

In sum, while the Project will and Grayson Repowering Project already does generate electricity, that does not make them reasonably foreseeable consequences of each other; they have different objectives, would be implemented independently, and would operate independently. The Project could be developed with or without the repowering of Grayson, and it could be implemented or abandoned whether or not the Grayson Repowering Project is approved and implemented.

9.2.3 Topical Response 3: Cumulative Impacts

Summary of Comments

Comments were received that the Draft EIR did not analyze potential cumulative impacts of the Project, particularly those associated with the future use of the landfill as recreation/open space.

Response

Lead Agencies are required to determine whether the project's incremental effect combined with the effects of other projects is "cumulatively considerable." (14 Cal Code Regs §15130(a)) This determination is based on an assessment of the project's incremental effects viewed in connection with the effects of past projects, the effect of other current project, and the effects of probable future projects. (14 Cal Code

Regs §15065(a)(3)). While it is not known precisely when and what areas of the Scholl Canyon Landfill will be closed, or when such closed landfill areas will be ready for conversion to uses specified in the JPA, it is nonetheless reasonably foreseeable that such a conversion of use will occur at some point in the future. Section 3.2, Related Projects, and Cumulative Impacts, of the Draft EIR is therefore being clarified to include an examination of future use of the landfill as a recreation/open space.

Also, with respect to the cumulative impact analysis, the City received a letter from SCAQMD noting other nearby permitted stationary sources of air pollutant emissions and if those sources were considered in the Projects analysis of potential cumulative impacts. Topical Response No. 5 and Response to Comment Letter L148 address SCAQMD's comments.

9.2.4 Topical Response 4: Aesthetics

Summary of Comments

Comments were received expressing general concern that the Project will have negative aesthetic impacts (including from lighting) on areas surrounding the Project as well as on areas outside of the City of Glendale. Comments included requests for updated and additional view shed analysis for existing vistas in surrounding and nearby housing associations. Commenters expressed concern over the aesthetic impact of the Project on an adjacent future recreational use after landfill closure.

Comments were also received asserting that the Project will violate Glendale's anti-ridgeline development goals for aesthetics and questioned if the Rim of the Valley Corridor Preservation Act exclusion will remain applicable. In relation to this, commenters posed questions regarding the effects of the Project on the ridgeline. Questions included:

- Could Project components be constructed elsewhere to not aesthetically affect the ridgeline? (Please note that this question presumes the Project would aesthetically impact the ridgeline, which presumption is not borne out in the analysis)
- Could Project lighting be motion detector?
- Would ridgeline excavation occur?

Additional comments asserted that the Project is not being appropriately designated as a utility in order to obtain exemption from the Glendale Municipal Code (GMC).

Response

Section 4.1 of the Draft EIR analyzes the Project impacts to Aesthetics. The CEQA Guidelines (Appendix G, Environmental Checklist, I. Aesthetics) require that only public views be considered in the visual impact analysis. Public views are those that are experienced from publicly accessible vantage points. Therefore, private views, such as those from single-family homes, are not required to be analyzed as part of CEQA. Visual conditions of the views from each of the four public viewpoints were evaluated in 2016 for the Draft MND and these viewpoints remain relevant and unchanged. This analysis determined that the Project would have less-than-significant to no-impact on aesthetics/visual resources. The aesthetics impact analysis determined:

- There are no designated scenic vistas near the Project site or within other parts of the existing Scholl Canyon Landfill, nor are there any designated scenic vistas from which the Project would be visible (see Section 4.1.3 of the Draft EIR).

- The proposed water tank would be located on a primary ridgeline. However, exemptions are provided by GMC, Chapter 16.08 - Design Standards, and allow for the maintenance, upgrading or improvement of an existing public or quasi-public utility located within an identified primary ridgeline. Furthermore, the City of Glendale's Land Use Element classifies the Project site as Recreation/Open Space. The Open Space and Conservation Element's focus is on preservation of open space, natural resources and amenities that are important to the residents of the City. Implementation of this Conservation Element required creating a Special Recreation (SR) zone, which permits various types of open space and recreation uses. The proposed utility and transmission facility are conditionally permitted in the SR zone and requires special consideration by the Planning Commission to protect open space, natural physical features and scenic resources, and to foster compatibility between uses. The Project will require a Conditional Use Permit to be reviewed by the Planning Commission.

- There are no state-designated scenic highways in the City of Glendale (California Scenic Highway Mapping System, 2017). Therefore, the Project would not damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. (see Section 4.1.3 of the Draft EIR).

- The Project is proposed to be located within the existing boundaries of a non-fill portion of the existing Scholl Canyon Landfill. The tallest Project features will be approximately 40 feet above ground, consisting of four, approximately 18-inch outside diameter engine exhaust stacks and a flare. Project equipment will be approximately 25 feet in height. The office and warehouse space will be approximately 12 feet in height. The Project consists of improvements that would be consistent with the industrial character of the existing LFG collection system facility and the Scholl Canyon Landfill. The existing LFG collection system facility has numerous structures, trailers, and equipment distributed throughout the Project site. Placement of Project components is based on geotechnical and structural stability as well as distance from existing attributes such as the water receiving location and general cohesion with Project design.

- Earth moving activities including excavation and grading will be implemented during the construction phase of the Project and are required for the installation of the proposed water tank. While construction of the proposed water tank would occur on a primary ridgeline, the Project is a utilities land use that is exempt from the requirements of GMC related to development on identified primary ridges. Therefore, the Project construction and system start-up activities would not conflict with goals related to the preservation of ridgelines and slopes (Goal 5).

- The Project consists of the demolition and upgrade to an existing industrial land use that does not have any scenic views, scenic vistas, or other important scenic resources that could be potentially significantly impacted. The existing LFG collection facility is presently a limited source of

> nighttime light and glare. Area lighting would be shielded, and light switch and motion sensors would be provided for safety at the Project facility. Lighting would be pointed downward and inward to minimize offsite impacts. Following recommendations received from California Department of Fish and Wildlife (CDFW), low level lighting will be used for the Project and all non-essential lighting will be eliminated. Additionally, the Project will limit the use of artificial light during the hours of dawn and dusk. All construction activities would be performed during daylight hours and would not result in an increase in offsite light or glare. The incremental amount of light and glare generated by the Project would be minimal due to the design measures incorporated into the Project, and because the Project site is located within a portion of the existing landfill with limited visibility from public viewing locations.

The Project is a use conditionally permitted by the City of Glendale General Plan and Zoning Ordinance, subject to the approval of a Conditional Use Permit (GMC Table 30.15-A). The GMC establishes ridgeline protection policy that expressly allows for the maintenance, upgrading or improvement of existing public or quasi-public utilities which traverse identified primary ridges. (GMC section 16.08.010.G). The Scholl Canyon Landfill, including the existing LFG collection facility site which the Project will replace, is located within an area of primary ridgeline that contains existing permitted public and quasi-public utility features. The Project's proposed power production equipment and appurtenant facilities are utility structures similar to the existing LFG collection system the Project will replace and similar to other operational features within the Scholl Canyon Landfill site. Portions of the Project that may be visible from offsite viewing locations, within and outside of the City of Glendale, are similar to, and would be consistent with, the existing views of the landfill. The Draft EIR examined all the aesthetic impact thresholds for the Project and determined that the Project would not create any new significant impacts on aesthetic resources.

Rim of the Valley Preservation Act

Although the hills surrounding the Scholl Canyon Landfill have been included in the Rim of the Valley Preservation Act, based on review of the Rim of the Valley maps, Scholl Canyon Landfill itself is excluded from the proposed Rim of the Valley Unit and would not be included as part of the Santa Monica Mountains National Recreation Area. Therefore, the statement in Section 4.1.3.2 of the Draft EIR that "*there are no designated scenic vistas near the Proposed Project site or within other parts of the existing Scholl Canyon Landfill, nor are there any designated scenic vistas from which the proposed Project would be visible"* is accurate because the expansion of the Santa Monica Mountains National Recreation Area is not approved, and the Scholl Canyon Landfill is excluded from the Rim of the Valley Unit. Additionally, a Fact Sheet published by Representative Adam Schiff, states that in the event the expansion of Santa Monica Mountains National Recreation Area is approved, it would respect "private property rights and existing local land use authorities. It will not require a landowner to participate in any conservation or recreation activities, and it will not put any additional restrictions on property owners. The bill does not allow for land acquisition through eminent domain." Therefore, by intentionally excluding the Scholl Canyon Landfill from the proposed Rim of the Valley Unit and since there is no intent to restrict property rights, or right to condemn such property, it can be concluded that permitted activities within the Scholl Canyon Landfill would not be subject to the restrictions envisioned under the proposed Rim of the Valley Preservation Act.

Article IX, Section E, of the JPA, states “At such time as all sanitary landfill operations are completed by Los Angeles County Sanitation District at the Premises, and all areas have been surrendered by Los Angeles County Sanitation District to City for park, recreation, and roadway purposes, or for the implementation of solid waste management alternatives or other facilities related to the operation of a sanitary landfill, henceforth City shall be solely responsible for the control of LFG on the Premises, including the operation and maintenance of all necessary gas control equipment and facilities, and the construction of any additional facilities and/or implementation of any additional procedures according to accepted practice and as required by any regulatory authority having jurisdiction over the Premises (JPA, 1997).” Based on these requirements of the JPA, and purpose of this EIR, future use of closed Scholl Canyon Landfill areas that are not devoted to gas control equipment and facilities will either be recreation or an open space use outside the limits of the Rim of the Valley Unit.

Because the landfill will continue to produce methane from the decomposition of landfill materials for years after closure, it is expected that the Project would continue to operate after areas of the Scholl Canyon Landfill begin to close and be converted to recreation, open space uses and for roadway purposes. By way of example, the Scholl Canyon Golf Course is constructed and operates on a closed part of the Scholl Canyon Landfill, and that area continues to produce methane which is collected and flared. It is therefore expected that the Project and future recreation and/or open space areas would operate simultaneously and the future recreation and open space areas would therefore need to be planned to: 1) accommodate the City’s current and on-going obligation to control LFG on site, including the operation and maintenance of all necessary gas control equipment and facilities, and 2) accommodate the construction of any additional facilities and/or implementation of any additional procedures according to accepted practice and as required by an regulatory authority having jurisdiction over the site as it relates to gas control measures.

9.2.5 Topical Response 5: Air Quality / Greenhouse Gases

Summary of Comments

Comments received expressed concern in regard to:

- What appears to be the use of emission offset credits to justify the project, while ignoring local air quality (e.g., “… trading these pollutants with credits so it wipes out the emissions on paper only.”).
- The air quality study conducted for the Biogas Renewable Generation Project did not include existing emissions at the Scholl Canyon Landfill.
- Cumulative impacts of the Grayson Repowering Project and the Scholl Canyon Landfill Expansion Project were not addressed.
- Air quality impacts from temporarily flaring LFG.

RESPONSE TO COMMENTS

- Air quality impacts from flaring LFG and operating the reciprocating internal combustion engines simultaneous in order to capture and combust expected LFG.
- Health risks for local populations, including local commercial and residential receptors.
- The need to burn LFG.
- The inclusion of GHG emissions resulting from LFG combustion at Grayson Power Plant in the Biogas Renewable Generation Project baseline conditions.
- The basis for selection of baseline conditions for the purposes of CEQA analysis.
- Increase or reduction in LFG production.
- Dioxin and furan compounds emissions.
- Air quality impact of the Project when the landfill is closed and converted to recreational use.
- The availability of Priority Reserve Credits.
- Application of Best Available Control Technology (BACT).

Response

SCAQMD Regulatory Program for New Sources

Emission offsets are only one of the three mandates by SCAQMD and USEPA that apply to the construction of an emission source, such as the Biogas Renewable Generation Project. Those mandates require that the Best Available Control Technology ("BACT") be used to reduce emissions to the Lowest Achievable Emission Rate ("LAER"), that no net emission increase in the South Coast Air Basin (managed through the use of emission offsets) occur, and that air quality analysis using approved models demonstrate that a new source would not result in significant local air quality impacts. These mandates are collectively referred to as New Source Review (NSR). Compliance with each of the three NSR mandates must be made independently and in no case is compliance with one mandate (such as the requirement to offset emission increases) a substitution for compliance with the other mandates, such as the prohibition against causing a violation of, or significantly worsening a violation of, ambient air quality standards. Failure to comply with any of the three mandates will disqualify the Project from SCAQMD construction and operating permits. The following sections of this Topical Response summarize the three NSR mandates as applied to the Project.

<u>BACT / LAER</u>

NSR requires that new emissions sources that are part of the Project incorporate current BACT and meet LAER. This is accomplished by utilizing highly efficient biogas reciprocating internal combustion engines

combined with effective post-combustion emission control technology. The technology selected for the proposed Project is highly effective at reducing emissions.

No Net Emission Increase

NSR requires that, on a regional basis, no increase in nonattainment pollutants or their precursors would result from the Project. This provision applies to emissions of NO_X, VOC, PM10 / PM2.5 and SO_X. CO emissions do not require offsets because the South Coast Air Basin is in attainment with both state and federal ambient CO standards. Even with the application of BACT, however, a proposed project could result in an increase in these emissions. The federal Clean Air Act and SCAQMD permitting policy recognize that a blanket prohibition of new emission sources in any community would be harmful to the wellbeing of the community. To provide a vehicle for managing no net increase in regional emissions with the need to build new sources to address community need, both USEPA and SCAQMD allow for the use of emission offset credits. The offset credit program allows SCAQMD or permit holders to generate an instrument (credit) reflecting a real, permanent and quantifiable emission reduction. The instrument can then be used to offset an emission increase at an existing or new facility.

Emission offsets for the Project include verified and quantifiable emission reduction credits that are held in the SCAQMD Priority Reserve, which is established to provide offset credits for specific priority sources that must be operated to ensure public safety and wellbeing. LFG naturally generated by the Scholl Canyon Landfill is required to be handled through a gas collection and combustion system, and not vented to the atmosphere. Operating without such a system would be in violation of federal and SCAQMD regulations and would contribute to emissions of GHGs, VOCs and toxic pollutants. The SCAQMD's Priority Reserve provides credits for essential public services and SCAQMD Reg XIII defines the construction and operation of a landfill gas control or processing facility as an essential public service. The requirement to offset increases in nonattainment pollutants or their precursors ensures that there would be no net increase of these air pollutants in the South Coast Air Basin from the Project, and it would not conflict with the implementation of SCAQMD's air quality management plan.

Priority reserve credits reflect emission reductions that are real, quantifiable and permanent in accordance with SCAQMD NSR regulations as well as state and federal regulations. SCAQMD maintains the credits to account for emission increases from essential public service facilities like Scholl Canyon Landfill and for small emission sources that are exempt from the requirement to secure offsets from the private market. On September 4, 2020, SCAQMD provided its annual report of the accounting of its offset reserves. Based upon the SCAQMD report, the reserve of available credits is not in jeopardy of being depleted because annual emission reductions due to stationary source facility closures and the application of emission control technologies are significantly greater than emission increases from new sources. The 2020 report indicates that SCAQMD has credits available to offset approximately 25 tons per day for NOx, 117 tons per day for VOC, 4 tons per day for SOx and 17 tons per day for PM10. The Project will require Priority Reserve credits of approximately 75 pounds per day NOx (0.15% of reserves), 107 pounds per day VOC (0.05% of reserves), and 35 pounds per day SOx (0.4% of reserves). No offsets are needed for PM10 because the project reflects an emission reduction from currently-permitted levels. The SCAQMD does not require offsets for CO.

Eligibility for Priority Reserve credits is granted through SCAQMD Rule 1309.1. Four classes of facilities/ projects are eligible for Priority Reserve credits, including Innovative technology, research operations, essential public service facilities and certain electrical generating facilities. Eligibility for Priority Reserve credits is determined by meeting any single one of the four classes of facilities or projects. Essential public facilities have priority when accessing the reserves over the three other facility or project classes. The Scholl Canyon Landfill and the Project are classified as essential public service facilities and will access the SCAQMD Priority Reserve as such.

Ambient Air Quality Demonstration

The third component of NSR is a required demonstration that a new emission source will not cause a violation of, or significantly add to an existing violation of, state or federal ambient air quality standards. Although the Project meets BACT / LAER to reduce potential emissions and is fully offset to ensure no net increase in nonattainment pollutants, GWP must independently demonstrate that the Project will not cause or significantly add to a violation of state and federal ambient air quality standards for NO_2, CO, PM10, PM2.5 and SO_X (there are no ambient VOC standards).

The EIR contains results of the air quality impact analysis prepared for the Project which demonstrates compliance with NSR requirements. The analysis was conducted using tools mandated by USEPA and in accordance with policies and protocol established by SCAQMD. Prior to initiating the analysis, the City submitted an analysis protocol to SCAQMD for comments and approval, which SCAQMD approved. SCAQMD provided comments to the City of the Draft EIR. Please refer to Response L148.

New Source Review (NSR) Summary

SCAQMD requires that three independent NSR demonstrations be made. They include demonstrations that the Project: 1) will use BACT and meet LAER to minimize emissions to the greatest degree possible, 2) does not result in an increase in regional emissions through the use of emission offsets, and 3) does not result in a violation or significant increase to an existing violation of an ambient air quality standard. These demonstrations support not only the CEQA analysis contained in the EIR but must also be met for SCAQMD to issue construction and operating permits for the Project.

The EIR includes an updated air quality impact analysis that reflects more current baseline ambient air quality and emissions than were utilized for the MND. SCAQMD suggested that the baseline data be updated to reflect more current operations since the MND was considered. Like the Draft MND, this EIR demonstrates compliance with all three components of SCAQMD NSR. To ensure clarity, the EIR has been updated to show Project impacts relative to the baseline data contained in the MND as well as the more current baseline data that SCAQMD suggested to be used in the EIR for air quality impact analysis.

Air Quality Impact from the Existing Emissions at the Landfill and Other Proposed Projects

Existing Emissions at the Landfill

The current landfill activities that may generate emissions include off road equipment, vehicles, and stationary sources, which include the existing flares, portable engines, storage and dispensing system, and consumer products, such as paints, sealants, and cleaners. These existing emissions are part of the background concentration of criteria pollutants in the ambient air quality analysis of the Draft EIR. The background concentrations were added to the criteria air pollutants concentration of the proposed Project to analyze the impact to the localized ambient air quality. As shown in the Draft EIR, the total criteria pollutant concentrations are below the state and national ambient air quality standards.

Air Quality Impacts from Flaring Landfill Gas at Scholl Canyon Landfill

As part of the Project, the LFG piping system to Grayson Power Plant will be decommissioned, purged, capped, and abandoned in place and as required by law and authorized by existing permits. In 2018, the City stopped combusting LFG at the Grayson Power Plant and has instead been incinerating the gas at the Scholl Canyon Landfill flares. The LFG will continue to be combusted in the existing flare system to control fugitive VOC and methane emissions until the Project is constructed. The Project does not increase the volume of gas being combusted. SO_X emissions are largely fuel-dependent based upon sulfur content of the fuel and are not dependent upon combustion technology. SO_X emissions rates from combusting LFG – whether in a flaring system or boiler system are expected to be the same.

The proposed Project has gone through two different baseline emissions scenarios. When the Project started, no criteria baseline emissions were shown in the MND because the landfill gas was mainly combusted in the boiler system at the Grayson Power Plant. The emission inventory was shown in MND document date July 31, 2017. In 2018, the landfill gas was combusted in existing flare system at Scholl Canyon Landfill until now. The emission inventory shown in Draft EIR used the emission from the existing flare system as the baseline emissions. The following tables summarize the analysis with two different baseline scenarios:

Emission Inventory No. 1 LFG Combusted at Grayson Power Plant (Shown in MND)

Pollutant	Total Proposed Project (Engines Daily Max. Emissions (lbs./day)	Less: Baseline Emissions (lbs./day)	Offset Allocations from the SCAQMD Priority Reserve (lbs./day)	Remaining Scholl Canyon Power Generating Facility Emissions (lbs./day)
NO_X	165	0	165	0
CO	919	0	0	919
VOC	114	0	114	0
PM10	58	0	58	0
PM2.5	58	0	0	58
SO_X	81	0	81	0

Emission Inventory No. 2 LFG Flaring at Scholl Canyon Landfill (Shown in Draft EIR)

Pollutant	Total Proposed Project (Engines Daily Max. Emissions (lbs./day)	Less: Baseline Emissions (lbs./day)	Offset Allocations from the SCAQMD Priority Reserve (lbs./day)	Remaining Scholl Canyon Power Generating Facility Emissions (lbs./day)
NO_X	165	90	75	0
CO	919	42	0	877
VOC	114	7	107	0
PM10	58	62	0	[4]
PM2.5	58	62	0	[4]
SO_X	81	46	35	0

As shown in both tables, most criteria pollutants from both baseline emission scenario would not exceed the significance thresholds. CO and PM2.5 emissions would exceed the significance thresholds with Emissions Scenario No. 1 and CO continues to exceed the significance threshold when the flaring baseline is incorporated per Emissions Scenario No. 2. However, as discussed in both MND and draft EIR, air dispersion modeling for CO and PM2.5 was performed and determined that CO and PM2.5 emissions from the proposed Project are below the significance thresholds regardless of the baseline used.

Further, as outlined in 40 CFR 51, Appendix W, Section 9.2, the background data used to evaluate the potential air quality impacts need not be collected on the project site as long as the data are representative of the air quality in the subject area. The most representative background data is determined based on location, data quality and age of data and/ or in accordance with SCAQMD guidance. The background data from West San Gabriel Valley (Pasadena) and Central Los Angeles monitoring stations were selected for the air dispersion modeling in accordance with SCAQMD guidance and approval. These stations are the closest monitoring stations to the Project site, the data collection methods meet the data quality requirements of 40 CFR Part 58, Appendices A and B guidance, and the data have been collected within the preceding three years. Use of this data is therefore appropriate for the Project analysis

Potential Hazardous Air Pollutants and Health Risk

Local health risks are minimized due to the technology incorporated into the Project design (i.e., oxidation catalysts that reduce organic hazardous compounds) being proposed for the Project and also due to the large area of the landfill and surrounding open space. The Draft EIR contains results of a health risk assessment that was used to determine if increased health risks from the Project exceed significance thresholds established by Office of Environmental Health Hazard Assessment (OEHHA) and contained in



SCAQMD CEQA Guidelines. That assessment which is included in Appendix B of the Draft EIR identified the highest risk levels of any receptor location outside the landfill boundary and demonstrated that expected health risks are below the established significance thresholds.

Increase in Landfill Gas Production and Dioxin and Furan Compounds Emissions

Several commenters expressed concerns regarding the LFG production assumed in the Project is lower in quantity than more recent LFG production. Additionally, several commenters expressed concerns over the possibility of dioxin and furan compounds emissions from the Project.

Additional modeling analysis and health risk assessment were performed in response to comments received on the Draft EIR that evaluate an assumed increase in LFG volume and methane content as well as the presence of dioxin and furan compounds based on additional data not available for preparation of the MND. This modeling assumes the following parameters:

- LFG production was measured at 6,200 scfm and 135.26 MMBtu/hr. based upon a measured heating value of 363 Btu/cf (36 percent methane). Based on the updated quantity, the LFG will be utilized in the following simultaneously operated equipment:
    - Four reciprocating internal combustion engines: 105.36 MMBtu/hr;
    - Regenerative (regen) gas flare: 5 MMBtu/hr.; and
    - Flare system (remainder of the LFG): 24.90 MMBtu/hr.
- Los Angeles County Sanitation District has prepared an HRA in support of SCAQMD permitting for two new flares at Scholl Canyon Landfill pursuant with SCAQMD Rule 1118.1. In addition to not being required for SCAQMD permitting, the Los Angeles County Sanitation District HRA for the two new flares did not include dioxins and furans compound emissions because Los Angeles County Sanitation District is not required to test LFG for them and expects that if present in the LFG, dioxins and furans compounds would be destroyed by the high operating temperature of the flares. (Sam Shammas, P.E., Los Angeles County Sanitation District, Communication, July 13, 2021). Based on several reference documents, such as USEPA AP-42 chapter 2.4, CARB California Air Toxics Emission Factors (CATEF) database search, and SCAQMD AB2588 quadrennial Air Toxics Emission Inventory Procedures dated June 2020, dioxins and furans compounds emissions are not expected to come from internal combustion engines because the proposed engines will be equipped with oxidization catalysts that are designed to destroy organic emissions, including dioxins and furans. However, USEPA AP-42, chapter 2.4 draft report dated October 2008 shows possible dioxin and furans compounds from flares. To provide a conservative HRA, the health risk assessment for the Project was updated by including dioxins and furans compounds from the flare systems. The November 2018 source test conducted on the LFG combustion in the boiler at Grayson Power Plant was used to estimate the dioxins and furans emissions for purposes of evaluating potential air quality impacts of the Project, even though the LFG combustion at Grayson Power Plant was considerably less efficient than it will be in the Project's reciprocating internal combustion engines.. The source test shows an octachlorodibenzo-p-dioxin emission factor of 5.33E-10 lbs./mmcf. While the boilers at Grayson

Power Plant and the flares at Scholl Canyon Landfill are not equipped with emissions control systems capable of removing dioxins and furans, as noted above, the reciprocating internal combustion engines proposed for the Project would be equipped with oxidization catalysts that destroy dioxins and furans preventing their release into the atmosphere. The updated emission inventory for the Project is provided in Attachment A of the errata. Based on this data and analysis is can be reasonably concluded that there will be no air quality of human health risk from dioxins or furans from the Project.

- The landfill property boundary was revised in response to a SCAQMD comment and request to consider additional potential receptors. Specifically, the west property boundary of the landfill was reduced from what was considered in the MND to include Lower Scholl Canyon Park as an off-site receptor. Additionally, the north boundary of the landfill was reduced to include Scholl Canyon Golf course property as an off-site receptor. The adjustment to the landfill property boundaries did not result in any new potentially significant environmental impact or a substantial increase to a potential environmental impact previously disclosed in the Draft EIR.

- Ambient air quality background concentrations from the period originally analyzed (2014 through 2018) were revised to the period of 2015 through 2019 in accordance with SCAQMD guidance.

- Burbank Airport meteorological data was revised from the period originally analyzed (2008 through 2012) to the period of 2012 through 2016 in accordance with SCAQMD guidance.

Based on the updated parameters, air dispersion modeling for the ambient air quality analysis was performed pursuant with SCAQMD CEQA Air Quality Handbook and additional guidance from SCAQMD CEQA staff. The analysis also conforms with SCAQMD new source permitting policies. The following table shows the result of the updated analysis:

Ambient Air Quality Impact Analysis Result
Scholl Canyon Repowering Generation Project

Pollutant	Avg. Period	Project Impact	Background[a]	New Ambient	Limiting Standard	Type of Standard
NO_2[b]	1-HR	0.03702 ppm	0.0719 ppm	0.1089 ppm	0.18 ppm	CAAQS
NO_2[b]	1-HR (98th percent)	0.02083 ppm	0.0593 ppm	0.0801 ppm	0.10 ppm	NAAQS
NO_2[c]	Annual	0.00023 ppm	0.0154 ppm	0.0156 ppm	0.03 ppm	CAAQS
CO	1-HR	0. 1748 ppm	2.60 ppm	2.7748 ppm	20 ppm	CAAQS

Pollutant	Avg. Period	Project Impact	Background[a]	New Ambient	Limiting Standard	Type of Standard
CO	8-HR	0.0473 ppm	1.60 ppm	1.6473 ppm	9 ppm	CAAQS
PM10	24-HR	1.373 ug/m^3	96 ug/m^3	97.373 ug/m^3	Allowable increase of 2.5 ug/m^3	CAAQS / SCAQMD Allowable Increase
PM10[d]	24-HR (6th highest over 5 years)	1.046 ug/m^3	96 ug/m^3	97.046 ug/m^3	150 ug/m^3	NAAQS
PM10	Annual	0.193 ug/m^3	34.4 ug/m^3	34.593 ug/m^3	Allowable increase of 1.0 ug/m^3	CAAQS / SCAQMD Allowable Increase
PM2.5	24-HR	1.373 ug/m^3	30.5 ug/m^3	31.873 ug/m3	Allowable increase of 2.5 ug/m^3	CAAQS / SCAQMD Allowable Increase
PM2.5[e]	24-HR (8th highest)	0.956 ug/m^3	30.5 ug/m^3	31.456 ug/m3	35 ug/m^3 Below SIL of 1.2 ug/m^3	NAAQS EPA Significant Impact Level (SIL)
PM2.5	Annual	0.193 ug/m^3	12.58 ug/m^3	12.773 ug/m^3	Below SIL of 0.3 ug/m^3 Allowable increase of 1.0 ug/m^3	EPA Significant Impact Level (SIL) CAAQS / SCAQMD Allowable Increase
SO_2	1-HR	0.0032 ppm	0.018 ppm	0.0212 ppm	0.25 ppm	CAAQS
SO_2[f]	1-HR (99th percent)	0.00229 ppm	0.0094 ppm	0.0117 ppm	0.075 ppm	NAAQS



Pollutant	Avg. Period	Project Impact	Background[a]	New Ambient	Limiting Standard	Type of Standard
SO_2	24-HR	0.00071 ppm	0.002 ppm	0.0027 ppm	0.04 ppm	CAAQS

Notes:

b) Background values are based on the highest concentrations monitored at West San Gabriel Valley monitoring station (Station No. 088) during 2015 through 2019, except the PM10 and SO_2. The background values of PM10 and SO_2 were based on the readings from the Central Los Angeles monitoring station (Station No. 087) since the West San Gabriel Valley monitoring station did not record any background data for those pollutants. The selected monitoring station data reflects those stations closest to the project with applicable ambient analyzers in accordance with SCAQMD ambient air quality assessment guidelines and were confirmed with SCAQMD staff. SCAQMD maintains a network of monitoring stations located throughout the Basin for the purpose of informing the public of air quality and to support air quality impact analyses such as those conducted for the Project.

c) NO_2 1-hour modeling was refined using the AERMOD Ambient Ratio Method (ARM) option, which assumes an 80 percent conversion factor of NO_X to NO_2

d) NO_2 annual modeling was refined using the AERMOD ARM option, which assumed a 75% conversion factor of NO_X to NO_2.

e) PM10 24-hour modeled values were based on the maximum 6th highest concentration over 5 years period.

f) PM2.5 24-hour modeled values were based on the 8th highest concentration averaged over 5 years period with the background concentrations of 98th percentile of 24-hour data averaged over 5 years period.

g) SO_2 1-hour modeled values were based on the 4th highest concentration averaged over 5 years period with the background concentrations of 99th percentile of 1-hour data averaged over 5 years period.

h) There are receptors surrounding the facility at lower and higher elevations than the emission sources. The model reflects non-default option (flat terrain) on all receptors at lower elevations; and a default option (complex terrain) was selected to on receptors above the emission sources base elevation. The selected terrain options for both uphill and downhill receptors were selected in accordance with SCAQMD guidance because they provide the most conservative analysis results at each elevation.

As shown in the above table, the modeled highest concentration of NO_2, CO, and SO_2 plus the applicable background concentration did not result in any exceedances of the federal and state AAQS applicable to evaluating the Project's potential air quality impacts. For PM10 and PM2.5, the modeled maximum concentrations from the Project did not result in any exceedances of the state significant thresholds that are defined by SCAQMD. Attachment B of the errata includes additional information regarding model input / output files.

Natural Gas Augmentation

Several commenters noted that the Draft EIR reflected the assumption that natural gas would be used to supplement landfill gas in the internal combustion engines.

The Draft EIR reflected landfill gas analyses and collection rates that consistently declined in the 2014-2016 timeframe. The data supporting the Draft EIR reflects low gas collection volumes that are approximately 20% below historic averages for the landfill and methane content of less than 34%. With landfill gas methane content of less than 34%, small amounts of natural gas (approximately 3%-4% based upon BTU input) would likely be necessary to ensure efficient combustion by the internal combustion engines. Additionally, based upon initially projected landfill gas volumes and methane content, natural gas augmentation of up to 10% would allow for full utilization of the internal combustion engines and comply with SCAQMD regulations. For these reasons, natural gas augmentation of up to



10% was included in the MND. The assumed use of natural gas only affected emissions by increasing the total volume of fuel combusted in the engines, up to 100% capacity. Landfill gas emission factors were used to estimate emissions for the full utilization of the engines because doing so presented the highest potential impacts relative to air quality, health and climate.

The 2014-2016 data varies significantly when compared with historic trends for the Scholl Canyon Landfill. The 2014-2016 methane content observed at Scholl Canyon landfill is also uncharacteristic of similar landfills in the region. The landfill operator has since taken steps to enhance gas collection and to minimize air intrusion in the landfill gas stream at Scholl Canyon Landfill. As a result, both landfill gas collection volumes and methane content have increased since the MND was drafted. Based upon the improved collection system and updated models, adequate flows of gas with over 36% methane content are expected to exist for the foreseeable future.

The need for natural gas augmentation is expected to occur in the year 2045 because landfill gas methane content may fall below 34%. The model indicates, however, that at the time landfill gas methane content falls below 34%, the amount of total landfill gas generated at Scholl Canyon Landfill will also decline by approximately 20%. Even with natural gas augmentation, total fuel combustion at the facility would be lower than what is accounted for in the Draft EIR and also in line with what was reflected in the Draft EIR.

Dioxin and Furan Compounds

Several commenters expressed concerns over the possibility of dioxin and furan compounds emissions from the Project.

Dioxin and furan compound emissions were included in the Draft EIR analysis as a result of the landfill gas combustion in flare systems. USEPA AP-42, chapter 2.4 draft report dated October 2008 shows possible dioxin and furans compounds from flares, which are external combustion devices, rather than internal combustion devices such as the proposed engines.

AP-42 reference values in the USEPA Report reflect compounds that are thought possible to be present based upon emission source technologies and test results from such technologies (in this case, landfill flares). They do not reflect expectations for “all” landfills, nor do they reflect Scholl Canyon Landfill gas analyses or measurements of combustion emissions at the Scholl Canyon Landfill. To consistently utilize AP-42 references but also reflect data that is specifically relative to Scholl Canyon Landfill, the health risk assessment was updated by including dioxins and furans compounds that may be expected to be emitted by the flare systems. The source test conducted on the landfill gas combustion in the boilers at Grayson Power Plant was used to estimate the dioxins and furans emissions, rather than referring to AP-42 emission factors for the flares. Both the boilers and flares reflect external combustion sources without emission controls systems. The updated emission inventory is provided in Attachment A.

Based on several reference documents, such as USEPA AP-42 chapter 2.4, CARB California Air Toxics Emission Factors (CATEF) database search, and SCAQMD AB2588 Quadrennial Air Toxics Emission Inventory Procedures dated June 2020, dioxin and furan compounds emissions are not shown to be



emitted from internal combustion engines when burning landfill gas. Additionally, the fuel treatment system that will be used to remove siloxane compounds and particles such as metals from the landfill gas can also be designed to remove dioxins and furans, as well as compounds that may be precursors to dioxins and furans. The proposed engines will also be equipped with oxidation catalysts to destroy organic emissions, including dioxins and furans. For these reasons, dioxins and furans are accounted for only in the flares and not the internal combustion engines.

Health Risk Assessment

Based upon the updated LFG production and air dispersion models, a health risk assessment (HRA) was conducted to evaluate the potential cancer, chronic, and acute health impacts from the Project. The HRA was prepared in accordance with OEHHA guideline dated February 2015 and SCAQMD Risk Assessment Procedures for Rule 1401, 1401.1, and 212 Version 8.0 dated September 1, 2017. Two software programs, AERMOD and HARP2, were utilized for the HRA. AERMOD is an air dispersion model that was used to estimate the ground level TAC concentrations and the Hotspots Analysis and Reporting Program (HARP2) was used to estimate the cancer and non-cancer health impacts for individual receptors using ground level concentration data for multiple pollutants through multiple pathways. HARP2 was developed by OEHHA to estimate health risks. The model reflects OEHHA guidelines on potency and exposure thresholds for known toxic air contaminants.

Additionally, an updated health risk assessment was performed in response to SCAQMD comments to determine the increased health risk from the flaring operations that were not initially envisioned. As with the previous risk assessment for the Project, the updated risk assessment was conducted in accordance with SCAQMD and OEHHA guidelines. The results of the updated assessment continue to demonstrate that health risks attributed to the project are below significance thresholds.

The following table summarizes the highest maximum individual cancer risk (MICR), hazard index acute (HIA), and hazard index chronic (HIC) values at any receptor locations outside the facility boundary.

HEALTH RISK ASSESSMENT RESULT

Equipment	Cancer Risk	Chronic Health Index	Chronic 8-hour Health Index	Acute Health Index	OEHHA and SCAQMD Cancer Risk Significance Threshold	OEHHA and SCAQMD Chronic/ Acute Significance Threshold
Project	0.26E-06	0.016	0.0008	0.0076	10.00E-06	1.00

Note: The cancer risk, chronic health index, chronic 8-hour health index, and acute health index values of the proposed Project which were modeled pursuant with Office of Environmental Health Hazard Assessment (OEHHA) Guideline and SCAQMD Risk Assessment Procedures for Rule 1401, 1401.1 and 212. are the highest values of any receptors outside the landfill property boundary. Since the values are already below the SCAQMD significance threshold of 10E-06 for cancer risk and 1.00 for the health index, no further analysis was conducted to obtain readings at the nearest residential or worker receptors. Risks at residential and worker receptor locations would be lower than those reflected in the table.

Pursuant to SCAQMD Rule 1401, cancer burden is defined as the estimated increase in the occurrence of cancer cases in a population subject to a MICR of a greater than or equal to one in one million resulting from exposure to toxic air contaminants. As shown in the above table, the highest MICR at any receptors outside the landfill property boundary is less than one in one million. Therefore, the cancer burden analysis is not necessary because the cancer burden would be zero cancer cases. Attachment C of the errata includes additional information on the health risk assessment analysis.

Air Quality Impact of the Project when the Landfill is Closed and Converted to Recreational Use

Several commenters expressed concerns regarding the air quality impact of the Project when the Scholl Canyon Landfill is closed and converted to recreational use. It is expected there will be a transitional period where the power generation facility will continue to be operated after the landfill has been converted to recreational use.

Air dispersion modeling and health risk assessment were performed to determine potential air quality and health impacts within the existing landfill boundaries and to determine the extent to which future public access could be granted. All the modeling parameters of the on-site analysis are identical to the updated analysis discussed in the previous section, with the exception of the assumed facility boundary. In the on-site assessment, the facility boundary was assumed to be the boundary of the industrial operation, rather than the broader boundary of the landfill to consider a future recreation land use adjacent to the power generation facility after landfill closure.

The following table shows the result of the analysis of impacts within the landfill property.

POST LANDFILL CLOSURE – RECREATIONAL USE AMBIENT AIR QUALITY IMPACT ANALYSIS RESULTS

Pollutant	Avg. Period	Project Impact	Background[a]	New Ambient	Limiting Standard	Type of Standard
NO_2[b]	1-HR	0.08361 ppm	0.0719 ppm	0.1555 ppm	0.18 ppm	CAAQS
NO_2[b]	1-HR (98th %)	0.06448 ppm	0.0593 ppm	0.1238 ppm	0.10 ppm	NAAQS
NO_2[c]	Annual	0.00189 ppm	0.0154 ppm	0.0173 ppm	0.03 ppm	CAAQS
CO	1-HR	0. 7748 ppm	2.60 ppm	3.3748 ppm	20 ppm	CAAQS
CO	8-HR	0.2034 ppm	1.60 ppm	1.803 ppm	9 ppm	CAAQS

Pollutant	Avg. Period	Project Impact	Background[a]	New Ambient	Limiting Standard	Type of Standard
PM10	24-HR	11.73 ug/m^3	96 ug/m^3	107.73 ug/m^3	Allowable increase of 2.5 ug/m^3	CAAQS / SCAQMD Allowable Increase
PM10[d]	24-HR (6th highest over 5 years)	8.255 ug/m^3	96 ug/m^3	104.26 ug/m^3	150 ug/m^3	NAAQS
PM10	Annual	1.779 ug/m^3	34.4 ug/m^3	36.179 ug/m^3	Allowable increase of 1.0 ug/m^3	CAAQS / SCAQMD Allowable Increase
PM2.5	24-HR	11.73 ug/m^3	30.5 ug/m^3	42.23 ug/m3	Allowable increase of 2.5 ug/m^3	CAAQS / SCAQMD Allowable Increase
PM2.5[e]	24-HR (8th highest)	8.027 ug/m^3	30.5 ug/m^3	38.53 ug/m3	35 ug/m^3 Below SIL of 1.2 ug/m^3	NAAQS EPA Significant Impact Level (SIL)
PM2.5	Annual	1.779 ug/m^3	12.58 ug/m^3	14.359 ug/m^3	Below SIL of 0.3 ug/m^3 Allowable increase of 1.0 ug/m^3	EPA Significant Impact Level (SIL) CAAQS / SCAQMD Allowable Increase
SO_2	1-HR	0.018 ppm	0.018 ppm	0.036 ppm	0.25 ppm	CAAQS
SO_2[f]	1-HR (99th %)	0.0121 ppm	0.0094 ppm	0.0215 ppm	0.075 ppm	NAAQS
SO_2	24-HR	0.00441 ppm	0.002 ppm	0.0064 ppm	0.04 ppm	CAAQS

Notes:

a) Background values are based on the highest concentrations monitored at West San Gabriel Valley monitoring station (Station No. 088) during 2015 through 2019, except the PM10 and SO_2. The background values of PM10 and SO_2 were based on the readings from the Central Los Angeles monitoring station (Station No. 087) since the West San Gabriel Valley monitoring station did not record any background data for those pollutants.

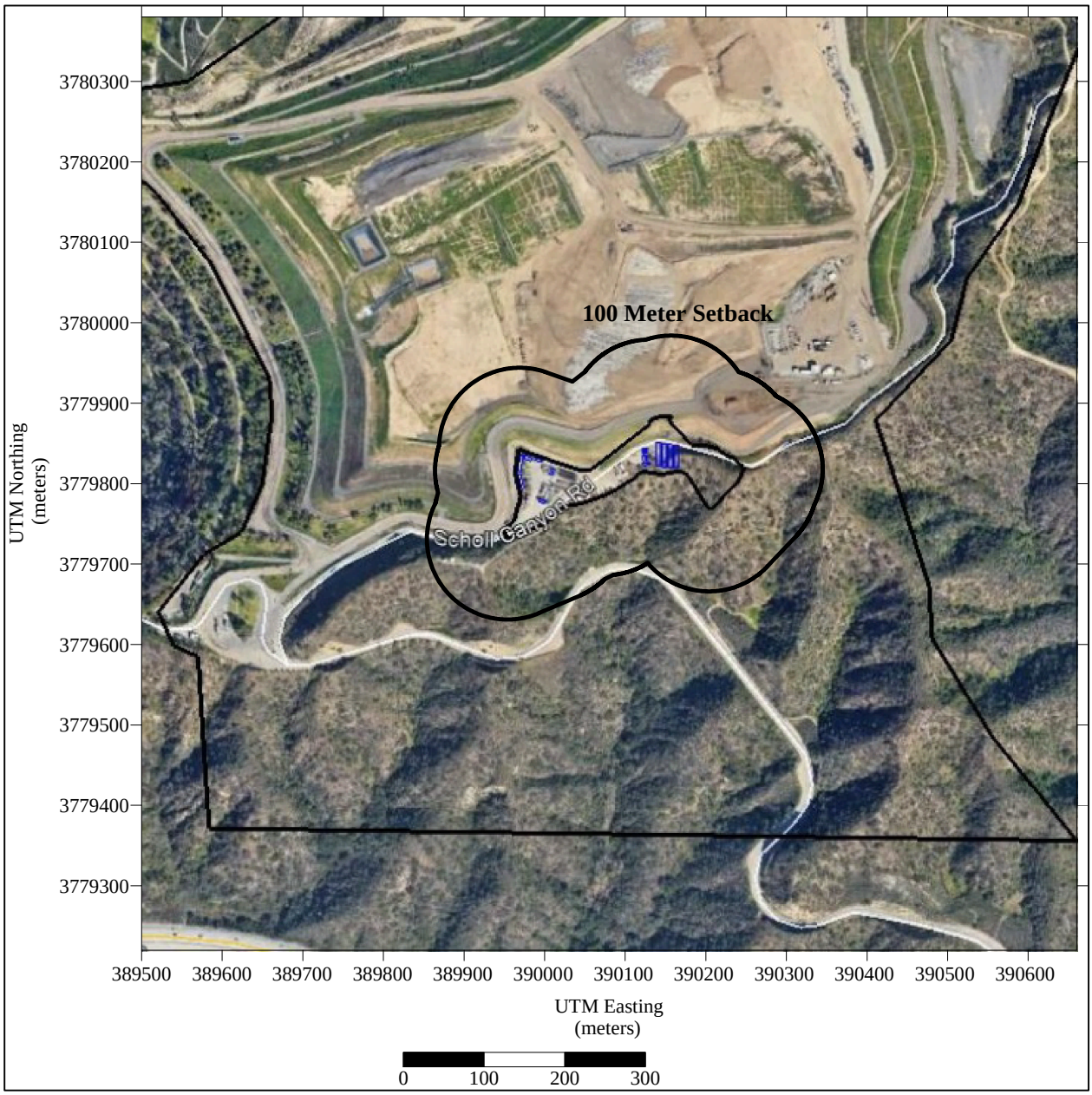
b) NO_2 1-hour modeling was refined using the AERMOD Ambient Ratio Method (ARM) option, which assumes an 80 percent conversion factor of NO_X to NO_2
c) NO_2 annual modeling was refined using the AERMOD ARM option, which assumed a 75 percent conversion factor of NO_X to NO_2.
d) PM10 24-hour modeled values were based on the maximum 6th highest concentration over 5 years period.
e) PM2.5 24-hour modeled values were based on the 8th highest concentration averaged over 5 years period with the background concentrations of 98th percentile of 24-hour data averaged over 5 years period.
f) Pursuant with federal requirements, SO2 1-hour modeled values were based on the 4th highest concentration averaged over a five-year period with the background concentrations of 99th percentile of 1-hour data averaged over a 5 year period pursuant to 40 CFR Part 50.

As shown in the table above, the modeled highest concentrations of the following pollutants exceed the ambient air quality standards:

- NO_2 in one-hour averaging period plus the applicable background concentrations exceeded the federal ambient air quality standard.
- PM10 and PM2.5 in annual averaging period exceeded the federal standard of allowable increase of 1.0 ug/m3.
- PM10 and PM2.5 in 24-hour averaging period exceeded the California standard of allowable increase of 2.5 ug/m3.
- PM2.5 in 24-hour averaging period plus the applicable background concentrations exceeded the California ambient air quality standard.

Since potential on-site exceedances of certain ambient air quality were identified, further analysis was conducted to measure the distance from the facility boundary at which point no exceedances of federal and state ambient air quality standards or significance thresholds. The model results show that a boundary of approximately 100 meters surrounding the generating facility would suitably ensure that future public access to the remainder of the landfill property could be granted. The following diagram illustrates the property boundary with no exceedances.

BIOGAS POWER GENERATING FACILITY SITE MAP



Attachment B of the errata includes additional information regarding model input / output files. Complete modeling files are available in electronic format.

Post Landfill Closure Health Risk Assessment

Based on the power generation facility property boundary, the following table shows the maximum MICR, HIA, and HIC values at any receptor locations, including potential public access space on the landfill.

POST LANDFILL CLOSURE HEALTH RISK ASSESSMENT RESULT

Equipment	Cancer Risk[2]	Chronic Health Index	Chronic 8-hour Health Index	Acute Health Index	Cancer Risk Significance Threshold	Acute / Chronic Risk Significance Threshold
Project	7.80E-06	0.17	0.028	0.26	10.00E-06	1.00

Note:
1. The cancer risk, chronic health index, chronic 9-hour health index, and acute health index values of the proposed Project shown in the table are the highest values of any receptors outside the landfill property boundary. Since the values are already below the significance threshold of 10E-06 for cancer risk and 1.00 for the health index, no further analysis was conducted to obtain readings at the nearest residential or worker receptors.
2. The health risk assessment shows the MICR values of 7.80 in a million at any receptors outside the power generation facility. Since the landfill is expected to be used only for recreational use not residential homes or workers, the MICR values of the Project are expected to be lower than 7.80 in a million at further receptor locations.

As shown in the above table, the health risk assessment shows the maximum MICR, HIA, and HI values at any receptor locations outside the property boundary are below the significance thresholds. Similar to previous section, cancer burden is expected to be zero cases because there is no population subject to a MICR of greater than or equal to one in one million. Attachment C of the errata includes additional information on the health risk assessment analysis.

The modeling analysis and health risk assessment were performed under the assumption that the landfill will ultimately be closed and converted to recreational use.

Greenhouse Gases

Increased landfill gas production

As explained in the above section, modeling analysis and health risk assessment were performed with increased LFG production of 6,200 scfm and 135.26 MMBtu/hr. based upon a measured heating value of 363 Btu/cf (36 percent methane). Therefore, GHG emissions of the Project were revised with the updated LFG production. The following table shows the net emission increase of greenhouse gases due to the Project. The increase in GHG emissions continues to be 310 mt/yr. CO_2e as stated in the Draft EIR. This increase is attributed to short-term emissions from heavy equipment and worker trips during the construction phase of the project and subsequent worker occupancy of the facility. These is no increase in on-site GHG emissions attributed to the operating phase of the Project, however off-site emissions attributed to maintenance and other staff transit are expected. A GHG emission inventory is provided in the Attachment D of the errata.



GHG EMISSIONS

Device/Activity	CO2 (MT/year)	CH4 (MT/year)	N2O (MT/year)	Total CO2e (MT/year)
Project[1]	61,696	3.79	0.75	62,013
Construction	257	0.06	0	258
Facility Occupants[2]	49	0.12	0.001	52
Baseline (Flares)	61,696	3.79	0.75	62,013
Net Emission Increase	306	0.18	0.001	310

Note:

[1]The Project GHG emissions were based on the landfill production rate of 6,200 scfm and operating schedule of 8,760 hours per year. This LFG is combusted in four engines, regen flare system, and the existing flare system.

[2]Facility Occupants include workers at the Power Generation Facility and existing adjacent gas collection facilities.

Need to Burn Landfill Gas and Relative Greenhouse Gas Emissions

Several commenters expressed concern regarding the need to burn LFG and the resulting GHG emissions from the Project.

Un-combusted LFG contains GHG emissions including carbon dioxide and methane. Based on the updated LFG production rates of 6,200 scfm, the Scholl Canyon Landfill produces approximately 44,000 metric tons of carbon dioxide and 18,000 metric tons of methane annually if not combusted. Methane emissions are especially important because the global warming potential of methane is approximately 25 times greater than that of carbon dioxide. In other words, 18,000 metric tons of methane emissions are equivalent to approximately 450,000 metric tons of carbon dioxide emissions as a contributor to global warming potential impacts. When both the methane and carbon dioxide content of the LFG are considered, Scholl Canyon Landfill generates approximately 490,000 metric tons of CO_2e per year.

The combustion of LFG is an effective way to destroy methane emissions and lower overall GHG emissions from landfill operations. Both SCAQMD and USEPA require LFG to be combusted. Based upon projected emissions for the Project, methane emissions from the combustion of Scholl Canyon Landfill gas are approximately 4.0 metric tons per year. The Project would reduce methane emissions by more than 99 percent. The final CO_2e emissions of the Project are estimated to be approximately 62,000 metric tons per year, an overall 87 percent reduction from the un-combusted LFG.

Inclusion of Grayson Power Plant Greenhouse Gas Emissions in an Analysis of Baseline Conditions

Several commenters expressed concern regarding the consideration of historic GHG emissions from the Grayson Power Plant as a baseline for determining significance of the Project.

In determining whether a project's impacts are significant, the Draft EIR compared the Project impacts to those impacts with existing environmental conditions. This baseline consists of the physical conditions that exist in the area affected by the Project at the time Project environmental analysis commences (at time of notice of preparation or commencement). The lead agency has the discretion to treat historical conditions or conditions that predate publication of the notice of preparation or commencement of the analysis as the baseline for analyzing impacts if there are reasons for doing so that are supported by substantial evidence. In this case, the area affected by GHG emissions is global in scope and the impacts are not dependent upon the precise location of the GHG emission sources.

The City discontinued the practice of combusting gas produced at Scholl Canyon Landfill in the Grayson Boilers in 2018. Nevertheless, the baseline CO2e emissions are the same regardless of the method of combustion (Grayson Boilers versus Scholl Canyon Flares versus Project) because the same LFG is being combusted.

The Project serves to combust LFG generated by the Scholl Canyon Landfill. Through the combustion process, the Project serves three purposes. First, the Project destroys methane emissions and reduces greenhouse gas emissions as discussed in the preceding section of this Topical Response. Second, the Project also destroys volatile organic gases (VOCs) and organic hazardous compounds through the combustion process. Third, the Project uses the renewable energy produced through the combustion of LFG to generate electricity. All three of these functions occurred when LFG from Scholl Canyon Landfill gas was burned in the Grayson Power Plant boilers.

The Project will consume LFG from the Scholl Canyon Landfill that was combusted at the existing Grayson Power Plant until 2018 and subsequently combusted at the Scholl Canyon Landfill Flares. Implementation of the Project will result in that same LFG being combusted at Scholl Canyon; accordingly, the Project will not increase the amount of LFG being produced or combusted and does not alter the ultimate impacts of GHG emissions from combusting the LFG. (See Air Quality and GHG emissions information above in this Topical Response). In addition, if the Project were not built, the Scholl Canyon Landfill gas would continue to be incinerated in the landfill flares.

9.2.6 Topical Response 6: Geology and Soils

Summary of Comments

Comments received expressed concern in regard to:

- Earthquake potential and Project vicinity to active faults.

- The amplification of seismic waves in a mountain setting.
- Impact to Project facilities in the event of an earthquake directly beneath the landfill.
- The dangers of processing methane at the Project site.
- Mitigation measures for landslides on exposed faces of the landfill and liquefaction at Scholl Canyon Park.
- Groundwater contamination due to the landfill being unlined and located on fractured bedrock.
- Emergency backup systems and mitigation measures for threats to power equipment, buildings, tanks, and pipelines.
- Pipeline rupture in the event of an earthquake and the effects it will have on areas outside of Glendale.

Responses

In determining whether a project's impacts are significant, the Draft EIR compares project impacts to those impacts with existing environmental conditions. This baseline consists of the physical conditions that exist in the area affected by the project at the time project environmental analysis commenced (specifically, at time of notice of preparation was issued). Assessment of the project's impacts is normally limited to changes in those existing physical conditions in the area affected by the project (14 Cal Code Regs section 15125(a). Accordingly, CEQA does not limit environmental analysis by jurisdictional boundary.

According to the Safety Element of the Glendale General Plan, "The City shall require geological studies as part of development proposals for critical facilities if such facilities are proposed within the Fault Hazard Management Zones of the Verdugo, Mt. Lukens, Hollywood and Sycamore Canyon faults as shown on Plate P-1 (Program 1-2.2 of Section 3.1.3)." The Project site does not fall within any of these Fault Hazard Management Zones. However, as stated in Section 4.5.4 of the Draft EIR, the closest active or potentially active earthquake fault is the Verdugo Fault located 0.3 miles to the southwest of the Project site. Therefore, a deterministic seismic hazard assessment was performed for the Project including ground motion estimates from a postulated M_w 6.9 earthquake on the Verdugo Fault per the maximum recorded moment magnitude by the United States Geological Survey (USGS)/CGS 2008 Fault Model. The Verdugo Fault trace in this model comprises the Verdugo-Eagle Rock-San Rafael fault system. Based on this assessment and other available geologic data, there is low potential for surface fault rupture from the Verdugo Fault and other nearby active faults propagating to the surface of the Project site. Additionally, there is no mapped fault that runs directly beneath the Project site and therefore the potential for an earthquake to originate from directly beneath the Project site is low. Furthermore, no evidence for surface rupture has been observed along Eagle Rock and San Rafael Faults (Weber et al., 1980).

CEQA does not require that an agency conduct every recommended test and perform all recommended research in evaluating a project's environmental impacts (14 Cal Code Regs §15204(a)); See also, *Bay Area Citizens v Association of Bay Area Gov'ts* (2016) 248 CA4th 966, 1017; *Society for Cal. Archaeology v County of Butte* (1977) 65 CA3d 832. See also *Association of Irritated Residents v County of Madera* (2003) 107 CA4th 1383, 1396; *Cadiz Land Co. v Rail Cycle* (2000) 83 CA4th 74, 102; *Riverwatch v County of San Diego* (1999) 76 CA4th 1428, 1447. Therefore, where there is no substantial evidence supporting the need for additional studies to determine the potential extent of geologic impacts on the project, and the research and analysis provided are adequate, no additional studies are necessary. Moreover, the Project would be designed and constructed in accordance with the applicable California Building Code, ASCE 7, and the Glendale Building and Safety Code which considers the risk of seismic events impacting facility structures. All structures will be designed in accordance with the current edition of the California Building Code and Glendale Building and Safety Code that is in effect at the time the facility is designed and not to codes or standards that have yet to be adopted or go into effect. The California Building Code (CBC) 2016 edition references ASTM 7-10. The next edition of the CBC (CBC 2019) will then reference ASTM 7-16. Therefore, any impact to Project facilities in the event of an earthquake from the nearest potential source, as well as potential increased seismic amplification due to topographical setting, is considered less than significant following applicable building codes and standards.

A requirement that a project comply with specific laws or regulations may also serve as adequate mitigation of environmental impacts in an appropriate situation. As the court explained in *Oakland Heritage Alliance v City of Oakland* (2011) 195 CA4th 884, 906, "a condition requiring compliance with regulations is a common and reasonable mitigation measure and may be proper where it is reasonable to expect compliance." In this case, the court upheld the city's reliance on standards in the building code and city building ordinances to mitigate seismic impacts. The Guidelines specify that reliance on compliance with a regulatory permit or similar process is sufficient mitigation if compliance with such standards can be reasonably expected, based on substantial evidence, to reduce the impact to the specified performance standard. (14 Cal Code Regs §15126.4(a)(1)(B)).

Processing Methane and Potential Leakage of Dangerous Contaminants from the Landfill

There will not be a substantial increased risk from combusting the LFG in the Project compared to existing conditions which already involve LFG collection and combustion in the onsite flares. Further, Project construction will include automatic seismically triggered shutoff valves on both the new natural gas line at the meter box and on the connection to the existing LFG pipeline. These automatic shut off valves will stop the flow of gas in the event of a seismic event. Therefore, there will be a less than significant potential for a gas leak and explosion at the Project as the result of an earthquake.

Volatile Organic Compounds and Other Contaminants Have Seeped Below the Subsurface

The Project would be located on a “non-fill” area of the Scholl Canyon Landfill site and not on top of the existing landfill material deposits. The subsurface at the Project site consists of very dense silty sands over slightly weathered, hard bedrock and would not have any foundation or other facilities that would penetrate the landfill or have any impact on volatile organic compounds and other contaminants that exist

below the subsurface. The purpose of the existing LFG collection facilities is the removal and destruction of volatile organic compounds from the subsurface.

Fault Rupture Hazard

As specified on page 5.3 of Appendix D: Geotechnical Investigation Report of the Draft EIR, the Project is not located within a currently mapped California Earthquake Fault Zone. While the nearest fault is the Verdugo Fault, located approximately 0.3 miles southwest of the site, based on available geologic data, there is low potential for surface fault rupture from the Verdugo Fault and other nearby active faults propagating to the surface of the site. However, in the event of an earthquake, the LFG and natural gas fuel supplies supporting the Project would be shut down by automatic seismically triggered shutoff valves installed as part of the design of the Project and would not represent a substantial fire/explosion risk. (See above re compliance with regulatory conditions).

Liquefaction and Seismically Induced Settlements

Subsurface conditions underlying the site consist mainly of dense to very dense silty sands over slightly weathered, hard bedrock. In addition, the groundwater level is very deep. The Project is located within an area where water bearing soils are not present. Consequently, the potential for liquefaction beneath this Project is negligible.

The Project is located approximately half a mile from Scholl Canyon Park. Scholl Canyon Park is situated over solid bedrock and the Project would have no effect on any geological or soil conditions at Scholl Canyon Park.

Specifics on the Project's foundation design, foundation construction, concrete slab-on-grade floor plans, permanent retaining walls, pavement design, expansive soil potential, corrosive soil potential, site preparation and grading, and post investigation services in place to support the design and construction of the Project are discussed in Section 7.0, Conclusions and Recommendations, of the Geotechnical Investigation Report provided as Appendix D to the Draft EIR. These Project plans and documents were analyzed as part of the Project description in the Draft EIR.

Landslides on Exposed Faces of the Landfill

For information regarding the potential impacts of landslides to the Project, please refer to Section 4.5.4, Geology and Soils, Project Impacts, of the Draft EIR.

A cut native slope is proposed at the northeast end of the proposed Project site. At present, the slope is configured at 1.5:1 (horizontal: vertical). Standard erosion protection measures such as a drainage swale or bench (one at the top and one approximately mid-way down on the face of the slope) incorporated into the proposed Project design will reduce the potential for sloughing and raveling from the face of the slope. Project compliance with design requirements set forth by Uniform Building Code and the City's Building and Safety Code will ensure maximum slope steepness is not exceeded.

The gas line would be routed above-ground except for at road crossings where the gas line would be buried to avoid conflict with vehicular/equipment use of the road. The gas line would primarily follow existing landfill roadways and down an existing terraced, engineered slope on an existing pipe rack to an existing SoCalGas meter. The existing terraced hillside is heavily landscaped and contains numerous storm water conveyance structures which serve to dissipate water flow and stabilize the slope.

Emergency Backup Systems

The Project would be remotely monitored through a Supervisory Control and Data Acquisition (SCADA) system. The SCADA system includes software and hardware elements that would allow the equipment to be monitored and controlled from the remote locations. Project operations would be remotely monitored using monitoring centers in Brea, California and Bristol, Pennsylvania. An alarm would be triggered at the power generation facility and at the remote monitoring locations in the event of an upset operating condition. The City's on-call staff would be immediately notified and called-out for operation and maintenance support. Extensive hands-on training would be provided to City operators who will also have access to the monitoring system. If needed, in an emergency, the engines can be completely shut off either manually or via remote access. The facility would be constructed with a battery uninterruptable power source designed to provide sufficient power to allow for the safe shutdown of the Project in the event of an emergency. In the event of Project shutdown, the facility will revert to baseline conditions and the methane will be flared using the existing flares onsite.

9.2.7 Topical Response 7: Hazards and Hazardous Materials

Summary of Comments

Comments were received stating concern that the Project could result in a fire, explosion and/or release of hazardous materials that would create a substantial hazard to public and property.

Summary of Response

The Project includes a fire protection system that complies with all applicable national, state, and local fire codes. The fire protection system has been reviewed and approved by the City of Glendale Fire Department, as the Certified Unified Program Agency. For additional information regarding wildfires and fire hazards please refer to Topical Response 9, below. The Potential Impact Radius of an explosion originating from the proposed natural gas pipeline is 9.26 feet. Considering that there are no residences or other habitable structures within the Potential Impact Radius and the pipeline is in a location not open to public access, a pipeline explosion would have a low risk of resulting in death, injury, or significant property damage. Moreover, in the post-closure scenario, a buffer zone around the Project will be maintained which will ensure any risk from pipeline explosion remains low.

The City proposes to replace the originally proposed anhydrous ammonia with R134a refrigerant or equivalent as allowed by CARB and SCAQMD, in the chiller system, and use 19-percent aqueous ammonia in the Selective Catalytic Reduction process to control emissions. R134a refrigerant is not a hazardous material and is commonly used instead of anhydrous ammonia which is a hazardous material. Accordingly, using R134a refrigerant or equivalent in the chiller system would not represent a substantial

health risk were it inadvertently released during equipment damage or failure. The Project would also utilize and store up to 10,000 gallons of 19-percent aqueous ammonia to achieve emissions control limits established by SCAQMD. According to the Clean Air Act regulations (40 CFR 68, Section 112(r)), the threshold of aqueous ammonia above which this chemical presents a risk for formation of toxic plume is 20,000 gallons of solution and use of aqueous ammonia of concentration that exceeds 20 percent. The proposed aqueous ammonia volume and concentration are lower than the regulation threshold levels. The analyses in Section 4.7 of the Draft EIR demonstrate use of R134a refrigerant, or equivalent, and 19-percent aqueous ammonia would result in less than significant hazards and hazardous materials impacts.

Response

Explosion Hazard from Natural Gas and Existing Biogas Pipeline

The Project's three-inch diameter natural gas pipeline would be designed in accordance with applicable pipeline safety standards and would be installed above ground except at road crossings. United States Department of Transportation, Pipeline and Hazardous Materials Safety Administration developed an equation that estimates the distance from a potential natural gas pipeline explosion at which death, injury, or significant property damage could occur. This distance is known as the "Potential Impact Radius". The Potential Impact Radius is calculated by the formula r = 0.69* (square root of ($p*d^2$)), where 'r' is the radius of a circular area in feet surrounding the point of pipeline failure, 'p' is the maximum allowable operating pressure in the pipeline in pounds per square inch and 'd' is the nominal diameter of the pipeline in inches.

The natural gas pipeline proposed as part of the Project would have a maximum operating pressure of 20 pounds per square inch and a diameter of three inches. The distance from an explosion at which death, injury, or significant property damage could occur is 9.26 feet. Considering that there are no residences, other habitable structures, or areas of substantial public attraction within the Potential Impact Radius, a pipeline explosion would have a low risk of resulting in death, injury, or significant property damage. The natural gas pipeline would be located west of the area considered for post-landfill closure recreation land use and would not represent a public safety risk for future recreation/open space land uses required by the JPA. The Project would result in decommissioning the existing 5.5-mile-long LFG pipeline from the Scholl Canyon Landfill to Grayson Power Plant. That pipeline has a maximum operating pressure of 50 pounds per square inch, a diameter of 14 inches, and a resulting distance from a potential explosion at which death, injury, or significant property damage could occur of 46 feet (Compliance Services Inc., 2016)[78]. Implementation of the Project includes decommissioning the existing LFG pipeline and therefore eliminating risks associated with a potential explosion from that pipeline.

Ammonia Hazard

The Draft MND for the Project evaluated the potential hazards associated with a proposed 3,000-gallon capacity anhydrous ammonia refrigerant chiller system. The proposed facility cooling system would have

[78] Compliance Services Inc., 2016, Part 192 Jurisdictional, Class Location, & High Consequence Area Analysis, Scholl Canyon Landfill Biogas Pipeline. Note: Calculation of Potential Impact Radius considers a natural gas factor specific to the LFG).

contained less than 10,000 pounds of anhydrous ammonia and risks from an upset condition were determined to be low. However, as determined in Section 4.7.4 of the Draft EIR, the anhydrous ammonia would be replaced with R134a refrigerant, or equivalent, as allowed by CARB and SCAQMD, in the chiller system. R134a refrigerant is not a hazardous material and is commonly used instead of anhydrous ammonia which is a hazardous material. This substitution eliminates potential hazard associated with anhydrous ammonia and would not create any new environmental impacts, worsen the effect of any environmental impacts, or require mitigation measures.

The Project would use 19-percent aqueous ammonia in the Selective Catalytic Reduction process to control emissions of nitrogen oxides from the generation equipment. According to the Clean Air Act Regulations (40 CFR 68, Section 112(r)), the threshold of aqueous ammonia above which this chemical presents a risk for formation of toxic plume is 20,000 gallons of solution and use of aqueous ammonia of concentration that exceeds 20 percent. The proposed aqueous ammonia volume and concentration are lower than the regulation threshold levels. The 19-percent aqueous ammonia would be stored in up to a 12,000-gallon capacity above ground storage tank. The tank would be surrounded by a secondary concrete containment structure that measures 38.5 feet long, 13.5 feet wide and 4.5 feet deep. The secondary containment structure can hold the entire contents of the tank, plus rainwater accumulation. The California Accidental Release Program regulates the use of aqueous ammonia with a concentration of one percent or greater if a threshold quantity of 500 pounds of ammonia is reached.

An offsite consequence analysis was performed for a hypothetical worst-case accidental release of aqueous ammonia using the USEPA approved Lawrence Livermore National Laboratory Atmospheric Dispersion Model for Denser-Than-Air-Releases (SLAB Model). The analysis assumed the complete failure of the storage tank, the immediate release of the contents of the tank and the formation of an evaporating pool of aqueous ammonia within the secondary containment structure. Under this scenario, evaporative emissions of ammonia would be subsequently released into the atmosphere. The dispersion and transport of these emissions into the atmosphere would be subject to meteorological conditions at the time of the release. To be conservative, worst-case meteorological data were used in the offsite consequence analysis pursuant with USEPA's Risk Management Program Guidance for Offsite Consequence Analysis (EPA, 2009)[79].

To provide a conservative analysis of potential offsite consequences of an ammonia release, a concentration of 75 parts per million ammonia considered by the California Energy Commission to be the concentration the public could be exposed to during a one-time event without experiencing serious adverse effects was used for screening purposes. For comparison, the Occupational Safety and Health Administration's Immediately Dangerous to Life and Health concentration for ammonia is 300 parts per million and USEPA's Accidental Release Prevention Program Toxic Endpoint concentration for ammonia is 200 parts per million. As it relates to the Project, a concentration of ammonia exceeding 75 parts per million beyond the Scholl Canyon Landfill property boundary would be considered a potentially significant impact.

[79] EPA. 2009. Risk Management Program Guidance for Off-site Consequence Analysis. Available: https://www.epa.gov/sites/production/files/2013-11/documents/oca-chps.pdf.

The results of the offsite consequence analysis for the worst-case release of ammonia indicate that the 75 parts per million concentration, would extend approximately 150 feet from the ammonia tank/release. This distance would not extend beyond the Scholl Canyon Landfill property boundary, and therefore such a condition represents a low public safety risk and would be a less than significant impact not requiring any mitigation. Future recreation land use in adjacent areas after landfill closure could be expected to have a 150-foot buffer from the Project boundary for public safety considerations in the event of a worst-case accidental release of aqueous ammonia. However, this buffer would represent a small area compared to that available for recreation and would be consistent with the requirements of the JPA.

9.2.8 Topical Response 8: Noise and Transportation

Summary of Comments

Comments received stated concern regarding the potential for noise and transportation and traffic impacts during Project construction and operation. Comments included concern for exacerbating the use of the Figueroa corridor during construction, Los Angeles County Operational Area Disaster Routes being impacted in the event of a major accident at Scholl Canyon Landfill, public safety related to an increase in truck traffic, illegal dumping in residential neighborhoods adjacent to the landfill, and cumulative traffic impacts. Additionally, commenters requested that Project impacts related to noise, traffic, and transportation be evaluated in relation to vehicle miles traveled (VMT).

Response

Noise and Transportation Impacts Were Analyzed in the Draft EIR

Potential noise and transportation and traffic Project impacts were analyzed in Sections 4.10 and 4.11 of the Draft EIR, respectively. The analysis included noise and traffic studies (Appendix J and K of the Draft EIR) and studied the Project's contribution to cumulative impacts. These analyses (which included Project vehicle trips on Figueroa Street) demonstrate the Project would have less than significant Project-specific and cumulative noise and traffic impacts.

Noise

The locations selected for collecting ambient noise measurements to determine representative existing noise levels for the Project were based on the nearest location of sensitive residential land uses in closest proximity to the Project. These residential land uses would have the greatest potential to be impacted by Project noise and are most appropriate for evaluating potential worst-case noise impacts of the Project on surrounding sensitive receptors. As shown in Table 35 of the Draft EIR, the nearest residential receptors are more than 2,000 feet from the Project site. The discussion below also demonstrates that noise from Project operation would not have a potentially significant noise impact to adjacent future recreation/open space land uses required by the JPA after landfill closure.

The demolition phase would involve construction equipment/activity resulting in the highest level of construction noise levels and therefore, was used to analyze the worst-case potential construction noise impacts of the Project. Results of construction and operation phase noise modeling conducted for the

Project and summarized in Tables 40 and 41 of the Draft EIR demonstrate that the Project would not exceed the applicable noise thresholds of significance.

Table 37 of the Draft EIR has been revised to be consistent with the predicted construction noise levels summarized in Table 41. The results of the construction noise modeling have been included in Appendix J of the Draft EIR. The results of the construction noise modeling show that construction activities with the highest potential noise levels would not exceed the applicable five decibel increase threshold of significance established by the City of Glendale's Noise Ordinance and would have a less than significant noise impact. Installation of the proposed water and natural gas pipelines would involve construction activities in closer proximity to sensitive receptors compared to construction at the LFG conditioning and power generation facility. For example, the western end of the proposed natural gas pipeline is located within approximately 200 feet of Lower Scholl Canyon Park. However, the proposed natural gas pipeline is limited to 3-inch diameter pipe that would primarily be installed above ground. As a result, pipeline installation is expected to involve limited support equipment that are not expected to generate substantial noise levels. Construction of the pipelines by nature are conducted in a linear manner and any noise associated with pipeline installation would occur within close proximity to any receptor during construction for a week or less.

Table 41 of the Draft EIR shows the resulting Project operation noise level at each of the six representative sensitive residential receptors. As shown in Table 41, Project operation noise ranges from 29.9 dBA to 40.6 dBA at each sensitive residential receptor. The greatest increase in existing noise levels at any of the six sensitive residential receptors modeled was predicted to be a 2.2 dBA increase during daytime and a 1.5 dBA increase during the nighttime, which are well below the City's allowable increase of 5 dBA in the City noise ordinance used for purposes of the Project's noise impact analysis. It should be noted that the City of Glendale's noise ordinance requires equal or more stringent noise limitations than those established by adjacent municipalities with sensitive receptors that could be affected.

The City of Glendale's Noise Element specifies a 65 dBA exterior noise standard for open space which includes parks where peace and quiet are determined to be of prime importance. The Noise Element additionally specifies that neighborhood parks are normally acceptable in noise environments up to 70 dBA. The Noise Element further lists sports areas/outdoor spectator sports as conditionally acceptable in noise environments up to 75 dBA. Appendix J of the Draft EIR shows the location of the 65 dBA, 70 dBA, and 75 DBA Project operation noise levels. The 65 dBA Project operation noise level would extend approximately 50 feet from the proposed power plant facility. Even when utilizing the conservative 65 dBA recreation land use compatibility threshold, a majority of the active landfill area would remain available for recreation after closure and in consideration of allowable noise levels.

Transportation

The Project would result in a peak of 42 passenger car equivalents per day during construction and six passenger car equivalent trips per day during operation. The long-term operation vehicle trips are comparable to those that already exist for operation of the LFG collection and treatment/conditioning activities and would represent a negligible increase from existing conditions. A majority of pipeline installation would be accomplished within the landfill property with access using Figueroa Street. Any use

of Glenoaks Canyon Road to support installation of approximately ¼ mile of natural gas pipeline located off the landfill property would be limited to several vehicles per day over a week or less. This limited level of vehicle use is not expected to result in traffic-related impacts on Glen Oaks Canyon Road.

The Notice of Preparation (NOP) for the Project was noticed March 21, 2019. At the time of the NOP, Project impacts related to vehicles were measured and analyzed using estimated vehicle trips and levels of service standard. At the time of the NOP, the City of Glendale had not yet adopted VMT as a method of measuring transportation impacts as required by SB 743. The City of Glendale has updated its Transportation Analysis Guidelines to require as of July 1st, 2020, a VMT analysis as part of transportation analysis and environmental review for development projects in the City. The City's updated Transportation Analysis Guidelines specify that projects that generate fewer than 145 daily vehicle trips can be presumed to cause a less-than significant transportation impact and would not require a detailed VMT analysis. As noted, above the Project would generate up to 42 passenger car equivalent trips per day during construction and 6 passenger car equivalent trips per day during operation. Because the Project would result in fewer than 145 daily tips, the Project can be presumed to cause a less-than significant transportation impact and would not require a detailed VMT analysis.

Disaster Routes

The Los Angeles County Operational Area Primary Disaster Routes identified for the City of Glendale are State Route 134, State Route 2, and Interstate 5. The Secondary Disaster Routes in the City of Glendale are Verdugo Road/Canada Boulevard, Foothill Boulevard, Colorado Street, and San Fernando Road (Los Angeles County Department of Public Works, 2012)[80]. Nearby Figueroa Street is also designated as a Secondary Disaster Route for the City of Los Angeles. It is important to note that according to Los Angeles County, disaster routes are not evacuation routes. Although an emergency may warrant a road be used as both a disaster and evacuation route, they are completely different. An evacuation route is used to move the affected population out of an impacted area.

The Project site is located approximately ½ mile from State Route 134 (the nearest Primary Disaster Route) and more than ¾ mile from the Figueroa Street (the nearest Secondary Disaster Route). The Project would not preclude or alter emergency access. As discussed above and within Sections 4.7 and 4.14 of the Draft EIR, the Project incorporates mitigation measures to reduce the potential for hazards, hazardous materials, and wildfire impacts. Mitigation Measures HAZ-1, HAZ-2, HAZ-3, and HAZ-4 would require worker training, equipment inspections, equipment maintenance in designated areas, and stringent fuel storage/refueling practices. Mitigation Measures FIRE-1, FIRE-2, and FIRE-3 would require preparation and implementation of a Fire Protection Plan, prohibition of smoking and open flames, and maintenance of firefighting water supply and tools during construction. The Project would be additionally designed and operated in accordance with applicable fire codes including vegetation clearance and setback requirements. The Project would result in a less than significant substantial increase or

[80] Los Angeles County Department of Public Works, 2012, City of Glendale Disaster Route Map, Available: https://dpw.lacounty.gov/dsg/DisasterRoutes/map/Glendale.pdf

potentially significant risk associated with a fire, explosion, or release of hazardous materials with mitigation incorporated.

Public Safety Related to an Increase in Truck Traffic

As noted in the Draft EIR, the following truck and worker vehicle trips would be associated with the Project:

- five roundtrip truck trips and ten worker vehicle trips daily during the four to five month-demolition phase;
- ten roundtrip truck trips and twelve worker vehicle trips daily during the nine to ten-month site grading and construction period; and
- three roundtrip truck trips and 20 worker vehicle trips daily during the two to three-month system startup phase.

Each truck was assumed to represent three passenger car equivalents and worker vehicles were assumed to represent one passenger car equivalent. There would be no increase in truck traffic during operation of the Project compared to existing conditions. Up to six worker vehicle trips would occur daily during operation, which is equivalent to what occurs under existing facility operations. While there would be an incremental increase in truck traffic during construction of the Project, a peak, short-term addition of the truck and vehicle trips during construction would not substantially increase risks to public safety.

Illegal Dumping

The Project does not include the hauling of waste materials to the Scholl Canyon Landfill from offsite sources that could result in illegal dumping in adjacent residential areas. Please also refer to Topical Response No. 1.

9.2.9 Topical Response No. 9: Wildfires

Summary of Comments

Comments were received that the Project has unacceptable fire hazard risks due to its location and use of flammable materials such as LFG and natural gas. Comments were also received expressing concern over single lane evacuation routes for local residences in the event of a fire.

Responses

Location in Very High Fire Hazard Zone

As noted in Section 4.14 of the Draft EIR, the Project site is located within a very high fire hazard zone. Despite the designation, the site itself has little wildfire potential due to the large areas with little or no native vegetation (fuel). Additionally, per Glendale Fire Prevention regulations, proper vegetation management procedures such as weed abatement and brush clearance programs are required and will

be implemented. *As noted in Newtown Preservation Society v. County of El Dorado, No. C092069 (3rd Dist., June 16, 2021)*, evidence about past wildfires and the risk of future wildfires impacting residents near a proposed project does not require the lead agency to prepare an EIR unless there is substantial evidence supporting a fair argument that the project may exacerbate existing wildfire hazards. Notwithstanding same, this EIR has thoroughly addressed the risks of wildfires and the City's preparedness to respond should the need arise. No substantial evidence of increased wildfire has been presented with respect to the Project.

Fire During Construction

Construction activities would include the operation of construction equipment and vehicles and use of flammable fuels in this equipment that would introduce a source of potential wildland fire. Mitigation Measures HAZ-1, HAZ-2, HAZ-3, and HAZ-4 would require worker training, equipment inspections, equipment maintenance in designated areas, and stringent fuel storage/refueling practices. Mitigation Measures FIRE-1, FIRE-2, and FIRE-3 would require preparation and implementation of a Fire Protection Plan, prohibition of smoking and open flames, and maintenance of firefighting water supply and tools during construction. As described further in Sections 4.7 and 4.14 of the Draft EIR, potential hazards, hazardous materials, and wildfire impacts of the Project would be less than significant with these mitigations.

Landfill Gas Release/Fire

LFG contains many different gases. Methane and carbon dioxide make up 90 to 98 percent of LFG. The remaining 2 to 10 percent includes nitrogen, oxygen, ammonia, sulfides, hydrogen and various other gases. LFG are produced when bacteria break down organic waste. The amount of these gases depends on the type of waste present in the landfill, the age of the landfill, oxygen content, the amount of moisture, and temperature. For example, gas production will increase if the temperature or moisture content increases. Though production of these gases generally reaches a peak in five to seven years, a landfill can continue to produce gases for more than 50 years. Methane is the major component of natural gas. It can be highly flammable and can form explosive mixtures with air if it concentrates in an enclosed space with poor ventilation. The range of air concentrations at which methane levels are considered to be an explosion hazard is 5 to 15 percent of the total air volume. Because the LFG is captured and burned, LFG explosions are uncommon occurrences. See the CDC link which discusses hazards of LFG. https://www.atsdr.cdc.gov/hac/landfill/html/ch3.html. LFG can become dangerous if it migrates into enclosed spaces and mixes with oxygen, and where it is not captured and combusted.

The existing LFG is not readily flammable outside of the conditions described above, consequently it would be highly unlikely that its release could or would result in spontaneous combustion. LFG is already currently burned in flares at Scholl Canyon Landfill under a permit from the SCAQMD; the Project involves burning that LFG and capturing the energy from that burn to generate electricity. The existing LFG treatment occurs under low gas line pressure and similarly, the Project would involve low gas pressures. For example, the Project would involve gas pressures below the 15 pounds per square inch gauge pressure the State of California uses for requiring specific safety design and labeling requirements for gases stored and handled at higher pressures. For comparison, the International Football Association

Board requires soccer balls to have a pressure between 8.5 and 14.7 pounds per square inch gauge (IFAB, 2017). Based on the low gas pressures associated with the Project and decommissioning of the 5.5-mile-long LFG pipeline to Grayson Power Plant that represents an existing fire risk, the Project's fire hazard would be similar to or lower than existing conditions.

The engines that would combust LFG for power generation are an additional source of potential fire. The most probable source of fire would be a lube oil fire. The electrical generating combustion engines would be placed in fire protection enclosures with fire suppression systems and electrical equipment would be placed in enclosures insulated with an inert gas. Because the engines would be contained in steel enclosures equipped with fire suppression systems, they would not represent a substantial risk of fire. The existing flares would remain and do not represent a new source of potential wildland fire.

Additionally, the proposed facilities include a fire protection system that consists of a new 60,000-gallon water tank, water conveyance piping, two fire hydrants, and fire protection sprinklers inside buildings. The proposed fire protection system is designed to meet National Fire Protection Agency and California Fire Code requirements. The City of Glendale Fire Department, as the Certified Unified Program Agency has reviewed and approved the Project's fire protection design which includes verifying compliance with all applicable national, state, and local fire codes. As a result of these fire protection measures, potential operation phase impacts from a fire, and as discussed in Section 4.14 of the Draft EIR, were determined to be less than significant.

In the unlikely event that piping or equipment containing LFG fails due to internal corrosion or external force, because pressures are less than 15 pounds per square inch gauge, the danger of a serious explosion is virtually non-existent (which is why the state does not require specific design and labeling of equipment containing materials at such low pressure). As previously mentioned, the LFG is not readily flammable as discussed above, so a release would be unlikely to result in spontaneous combustion. Additionally, as noted already, the engines are contained in steel enclosures equipped with fire suppression systems.

Evacuation Routes

As described above, the Project would have less than significant hazards and wildfire impacts with mitigation incorporated. The Project does not include a component that would alter the design, capacity, or degrade a public roadway. As summarized in Section 4.11 of the Draft EIR vehicle and truck trips associated with Project construction would not significantly reduce the level of service of any potentially affected public roadway. Project operation would involve a similar number of vehicle trips compared to those which occur in support of the existing LFG collection and flaring activities. Consequently, the Project would not result in an increase in vehicle and truck trips that would have the potential to significantly reduce the existing level of service on any public roadway or evacuation route.

Wildfire Mitigation Plan

Pursuant with Senate Bill 90, passed in September 2018, the City of Glendale maintains and reviews, amends, and adopts a City-wide Wildfire Mitigation Plan annually. The Wildfire Mitigation Plan focusses

on limiting likelihood of ignition of fires from assets and equipment and limiting local spread of fires to prevent wildfires (City of Glendale, 2021).

Fire Stations and Mutual Aid Agreements

Glendale Fire Department Station 23 is located approximately 1.45 miles north of the Project site. There is also a Los Angeles Fire Department station located approximately 1.4 miles south of the Project site. The City of Glendale has mutual aid agreements for fire response with surrounding municipalities including the Cities of Los Angeles and Pasadena. This mutual aid agreement would apply to a fire at the Project site.

9.2.10 Topical Response No. 10: Project Alternatives

Summary of Comments

Comments were received that the Draft EIR inadequately analyzed Project Alternatives.

Responses

Background – CEQA Requirements for Selection of Alternatives

CEQA requires that a Lead Agency describe a range of reasonable alternatives for evaluation, which would feasibly attain most of the basic project objectives but would avoid or substantially lessen any of the significant effects of the project. CEQA Guidelines Section 15126.6(a). The nature and scope of the alternatives studied in an EIR is governed by a rule of reason. CEQA Guidelines Section 15126.6(f). An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. CEQA Guidelines Section 15126.6(a). The EIR should briefly describe the rationale for selecting the alternatives to be discussed. CEQA Guidelines Section 15126.6(c).

There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. *Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553; Laurel Heights Improvement Association v. Regents of the University of California (1988) 47 Cal.3d 376*. Because the primary purpose of an EIR is to mitigate or avoid significant environmental effects, the alternatives discussion is focused on alternatives to the project that are capable of avoiding or substantially lessening any significant effects of the project, even if those alternatives would impede to some degree the attainment of the project objectives or would be more costly. CEQA Guidelines Section 15126.6(b).

Of the alternatives that fit the above criteria, the EIR need examine in detail only those alternatives that the Lead Agency determines could feasibly attain most of the basic objectives of the project. CEQA Guidelines Section 15126.6(f). An EIR need not present alternatives that are incompatible with the project's fundamental purpose. *Bay-Delta Programmatic Envt'l Impact Report Coordinated Proceedings (2008) 43 Cal.4th 1143, 1164; Bay Area Citizens v. City of Oceanside (2004) 119 Cal.App.4th 477; Jones v. Regents of Univ. of Cal. (2010) 183 Cal.App.4th 818.*

No set number of alternatives is necessary to constitute a legally adequate range of alternatives. The scope will vary from case to case depending on the nature of the project and the Lead Agency has discretion to determine how many alternatives constitute a reasonable range. *Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 566.*

Further, neither CEQA nor the CEQA Guidelines require that an EIR include studies comparing the project's environmental costs with its benefits. See *San Francisco Ecology Ctr. v City & County of San Francisco* (1975) 48 CA3d 584, 595. The only direct comparison required in an EIR is the comparison of project alternatives, and a cost-benefit analysis is not required in making that comparison. 14 Cal Code Regs §15126.6(d).

The Draft EIR complies with CEQA Requirements Regarding Selection of Alternatives

Section 5.0 of the Draft EIR evaluates a reasonable range of Project alternatives. In addition to the No Project Alternative (Alternative 1), the Draft EIR evaluates the following three Project alternatives: Convert the LFG to Natural Gas (Alternative 2), Convert LFG to Liquid Natural Gas (Alternative 3), and Locate Engine Generators at an Another Location (Alternative 4). As described in Section 2.1 of the Draft EIR, other than the No Project Alternative, Alternatives 2 through 4 were selected because each could feasibly attain some of the Project objectives. Because the Project does not result in unmitigated significant impacts, the Draft EIR instead focuses on Project alternatives that could potentially reduce environmental impacts as compared to the Project, while still attaining the Project objectives. Additionally, the alternatives selected reflect the types of projects that are either being used to manage LFG now at existing landfills in California on a LFG production scale similar to the Scholl Canyon Landfill or are being reasonably considered for such use.

While three Project alternatives were selected for detailed analysis, in addition to the No Project Alternative, several other Project alternatives were also considered, but not selected for detailed analysis. The rational for screening the alternatives not selected for further investigation is below:

Generate Electricity in Microturbines. As noted in Section 5.4.1 of the Draft EIR, there is not an existing or planned LFG project in California that generates electricity using microturbines on the scale needed to beneficially use the Scholl Canyon Landfill LFG. While microturbines are technically feasible, to accommodate the LFG, this alternative would need 70 microturbines to handle the LFG that would substantially increase the size of the operation and maintenance activities compared to the proposed Project that utilizes four internal combustion engines. This alternative would result in grading and development of an additional ½ acre of previously undisturbed areas adjacent to the active landfill compared to the proposed Project, therefore this alternative would result in an increase in impacts to aesthetics, biological resources, cultural resources, and land use from an increase in development of previously undisturbed land adjacent to the active landfill compared to the proposed Project. This alternative would substantially increase operation and maintenance activities associated with the number of microturbines necessary to process the LFG. Therefore, this alternative was not considered for further analysis.

Generate Electricity in Combustion Turbines. Gas turbines require high pressure inlet gas, and the installation of high-pressure gas compressors would reduce the proposed Project's electrical output and entail higher capital cost due to the increase in gas compression equipment and energy use required to compress the LFG compared to that required for RICEs associated with the proposed Project. The potential environmental impacts of gas turbines would be comparable to the Project's internal combustion engines, but implementation of this alternative would not only increase operational and maintenance costs, but it would not prevent otherwise potentially significant impacts from occurring compared to the proposed Project, therefore this alternative was not considered for further analysis.

Reduce the Number of Internal Combustion Engines from Four to Three. The potential environmental impacts of removing one gas engine and flaring excess gas would be comparable to the proposed Project, however this alternative would not avoid any potentially significant environmental impacts. Further, this alternative would not beneficially use the LFG to the same degree as the proposed Project and would not meet the Project objectives as well as the Project, therefore, this alternative was not considered for further analysis.

Generate Electricity with Fuel Cells. The largest obstacles to generating electricity from fuel cells with LFG are the high cost and energy requirement of the LFG cleanup system and unreliability of existing technology to effectively remove siloxanes, silicones, sulfur, VOC's and other unwanted constituents from the LFG. LFG cleanup system technology has not developed sufficiently to promote operations of fuel cells on LFG at the scale needed to consume the available LFG at the Scholl Canyon Landfill. This alternative would achieve the proposed Project objectives but to a lesser degree because of the impacts associated with the scale needed to consume the LFG, it is not technically or economically feasible at the scale required and therefore was not considered for further analysis.

Convert LFG to Compressed Natural Gas. This alternative would not substantially decrease any of the Project's environmental impacts. This Alternative would have lower operation phase emissions of air pollutants, greenhouse gases, and noise compared to combustion of the LFG in internal combustion engines to generate electricity. However, the air quality impacts from vehicle emissions and noise associated with hundreds of truck-fueling trips per day would likely result in comparable operational emissions and noise as the proposed Project. The construction disturbance size and duration of this alternative would result in greater, emissions, noise, and traffic during construction compared to the proposed Project. Additionally, more grading of previously undisturbed areas and removal of native vegetation would result because of the additional access needed to accommodate vehicle fueling; therefore, this alternative would have a greater potential impact to biological resources, geology and soils, and hydrology and water quality; particularly during construction. The additional site size and grading required would have also have a greater potential for aesthetics and land use impacts. There would be an increase in energy use due to the compression of the natural gas and traffic during operation of this alternative related to vehicles fueling at the CNG fueling station whether located at Scholl Canyon Landfill or Grayson Power Plant. The handling and storage of CNG represents a greater consequence in the event of an accidental release compared to the aqueous ammonia storage associated with the proposed Project for emissions control.

Further, potential construction air quality, greenhouse gas emissions, biological resources, geology and soils, hydrology and water quality, noise, and traffic and transportation impacts would be greater than those of the proposed Project. Potential operation phase aesthetics, hazards and hazardous materials, land use and planning, traffic and transportation noise, energy, and wildfire impacts would be greater than those of the proposed Project. While this alternative meets the proposed Project objective of beneficial reuse of the LFG, it would not generate electricity and will not assist the City in meeting the Renewable Portfolio Standard requirements. Consequently, converting the LFG to CNG for use as vehicle fuel was not considered further as an alternative due to substantially greater potential environmental impacts and not meeting the objectives as well as the proposed Project.

In summary, the Draft EIR considered various technology alternatives to capture, incinerate, and put the naturally occurring LFG produced by the waste decomposition process at Scholl Canyon Landfill to beneficial use. As explained in Section 5.4 of the Draft EIR, because of the increased environmental impacts, technological feasibility, appropriate fit on the site, among other factors, the Lead Agency chose a reasonable range of three feasible alternatives and the No Project for further evaluation.

Environmentally Superior Alternative

The CEQA Guidelines state that if the No Project Alternative is the environmentally superior alternative, the EIR must also identify “an environmentally superior alternative” from among the other alternatives. CEQA Guidelines Section 15126.6(e)(2). When none of the alternatives is clearly environmentally superior, it is sufficient for the EIR to explain the environmental advantages and disadvantages of each alternative.

The Draft EIR discussion of the comparative environmental impacts of the Project alternatives complies with the requirements of CEQA. The Draft EIR includes a detailed description of the potential environmental impacts of each Project alternative as compared to the proposed Project in Sections 5.6.1 through 5.6.4. In addition, Table 55 describes the environmental advantages and disadvantages of each alternative. Furthermore, the Draft EIR at Section 5.6.6 includes the required level of evaluation of the relative impacts of each Project alternative, and concludes that the Alternative 2 is the Environmentally Superior Alternative because it would reduce more proposed Project impacts when compared to the other alternatives. These include reductions in impacts to aesthetics, air quality, noise, greenhouse gas emissions and wildfire risk. Alternative 2 impacts on biological resources are similar to the proposed Project. Alternative 2 decreases more impacts compared to the proposed Project, also when compared to the other alternatives.

L1 - Responses to Comments from Bret Marnell, received July 9, 2020

L1-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L1-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L1-3 Please refer to Topical Response No. 2.

L1-4 The City consulted with solar developers and evaluated the potential for solar arrays atop the landfill after closure. The site was determined unfeasible for solar arrays as a result of potential landfill settling which would be inconsistent with required stability for the structural foundations for the arrays. As discussed in the EIR, the renewable electricity generation equipment associated with the Project would not be located on land with underlying landfill waste materials. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Response No. 10.

L1-5 Please refer to Topical Response No. 7. LFG is already being flared at Scholl Canyon Landfill pursuant to an existing SCAQMD permit.

L2 - Responses to Comments from Carolyn Howard-Johnson, received July 9, 2020

L2-1 The comment is a general statement expressing the commenter's support of the Project. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L3 - Responses to Comments from Dan Petroff, received July 9, 2020

L3-1 Please refer to Section 5.4, Alternatives Considered and Not Selected for Further Analysis, of the Draft EIR for the discussion of the Project alternative of generating electricity in combustion turbines (Section 5.4.2). The Project involves combusting LFG in

reciprocating internal combustion engines to produce renewable electricity. Please also refer to Topical Response No. 10.

L4 - Responses to Comments from Jake Katz, received July 9, 2020

L4-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 1, 5, and 7.

L5 - Responses to Comments from Ken Grayson, received July 9, 2020

L5-1 The cost of the project is a budgetary and policy issue, not a CEQA issue. Under Pub Res C §§21100 and 21151, which require an EIR for projects that "may have a significant effect on the environment," the phrase "significant effect on the environment" is limited to substantial, or potentially substantial, adverse changes in physical conditions within the area as defined in Pub Res C §21060.5. In §21060.5, "environment" is defined as the physical conditions which exist within the area which will be affected by a proposed Project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. See also 14 Cal Code Regs §15360. As a result of this statutory mandate, effects that are subject to review under CEQA must be related to a change to the physical environment. 14 Cal Code Regs §15358(b). Only changes to the physical environment will trigger the need for an EIR; social or economic impacts alone will not do so because they are not changes in physical conditions. This principle is reflected in 14 Cal Code Regs §§15064(e) and 15382, which provide that economic and social changes may not be treated as significant effects on the environment. It is also reflected in Pub Res C §21080(e) and 14 Cal Code Regs §15064(f)(6), which provide that evidence of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment is not substantial evidence of a significant effect on the environment. See also Pub Res C §21082.2(c). Please also refer to Topical Response No. 10.

L6 - Responses to Comments from Romeo Balina, received July 9, 2020

L6-1 Please refer to Response L5-1.

L7 - Responses to Comments from Roberto Melendez, received July 31, 2020

L7-1 Please refer to Response L1-4. Please also refer to the Project Description in the EIR and to Section 5.0, Alternatives, of the Draft EIR for the analysis of project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the project objectives, reduce project impacts is some areas, and will assist in informed decision-making. The objective of the proposed

Project is to safely capture all the existing and future LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill to destroy the methane and use it for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Response No. 10.

L8 - Responses to Comments from Bill Markis, received August 1, 2020

L8-1 The Project evaluated in the Draft EIR is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft EIR. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L9 - Responses to Comments from Nancy and Dan Wall, received August 5, 2020

L9-1 Please refer to Topical Responses No. 1, 5, and 7.

L10 - Responses to Comments from Fred Wallingford, received August 9, 2020

L10-1 Please refer to Topical Response No. 5.

L10-2 Please refer to Topical Response No. 2.

L10-3 The comment is a general statement about the commenter's concerns for (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L11 - Responses to Comments from Jay Jen Mimi Sam and Ozzie Duplass, received August 10, 2020

L11-1 Please refer to Topical Responses No. 1, 5, and 7.

L12 - Responses to Comments from Kit Cole, received August 12, 2020

L12-1 The comment is a general statement expressing the commenter's support of the Project. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L13 - Responses to Comments from Ken Salter, received August 18, 2020

L13-1 The comment is a general statement about the commenter's concerns for (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's

statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L13-2 Please refer to Topical Responses No. 1, 5, and 7.

L13-3 Please refer to Topical Response No. 5.

L13-4 Please refer to Topical Responses No. 1, 5, and 7.

L14 - Responses to Comments from Mona Valeriano, received August 19, 2020

L14-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 5, 6, 8, and 9.

L14-2 Please refer to Topical Responses No. 6 and 9.

L14-3 The Project evaluated in the Draft EIR is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft EIR. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L14-4 Please refer to Topical Response No. 5.

L14-5 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Responses No. 2 and 10.

L14-6 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L14-7 Please refer to Topical Response No. 1.

L15 - Responses to Comments from WM Johnson, received August 19, 2020

L15-1 The Project evaluated in the Draft EIR is the Biogas Renewable Generation Project. The comment refers to air conditioning, utility write-offs, and housing development which are not within the scope of the Project evaluated in the Draft EIR. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L16 - Responses to Comments from Elisa Foster, received August 22, 2020

L16-1 Please refer to Topical Response No. 5.

L16-2 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. The objective of the proposed Project is to safely capture and incinerate all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Response No. 10.

L17 - Responses to Comments from Stephanie Chan, received August 22, 2020

L17-1 The Project evaluated in the Draft EIR is the Biogas Renewable Generation Project. The comment refers to "retrofitting a dirty fossil fuel plant" which is not the project that is the subject of this EIR, or within the scope of the Project evaluated in the Draft EIR. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L17-2 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Response No. 10.

L18 - Responses to Comments from County of Los Angeles Fire Department, received August 25, 2020

L18-1 The comment is with regard to the Planning Division of the County of Los Angeles Fire Department. The comment states that the subject property is entirely within the City of Glendale and does not appear to have any impact on the emergency responsibilities of the County of Los Angeles Fire Department.

L18-2 The comment is with regard to the Land Development Unit of the County of Los Angeles Fire Department. The comment states that the subject property is entirely within the City of Glendale and is unlikely to have an impact that necessitates a comment concerning general requirements from this Unit.

L18-3 The comment is with regard to the Forestry Division of the County of Los Angeles Fire Department. The comment states that responsibilities of this Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archaeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas are addressed in Sections 4.3.4, 4.5.4, 4.8.4, 4.12.4, and 4.14.4 of the Draft EIR. The Final Initial Study/ Mitigated Negative Declaration (IS/MND) for the Biogas Renewable Generation Project concluded that the proposed Project would not result in potentially significant and unavoidable environmental impacts related to cultural resources, and therefore, additional analysis concerning cultural resources was not carried forward to the Draft EIR.

While not considered a sensitive community for the purposes of CEQA, coast live oak and scrub oak are protected under the City of Glendale's "Indigenous Tree Ordinance." Depending on the diameter at breast height of the impacted trees a permit and replacement trees may be required. The City of Glendale would be required to seek a permit for impacts to protected trees to comply with the "Indigenous Tree Ordinance." Please refer to Section 4.3 of the Draft EIR for additional analysis and information regarding biological resources.

L18-4 The comment is with regard to the Health Hazardous Materials Division of the County of Los Angeles Fire Department. The comment states that the subject property is entirely within the City of Glendale and the County of Los Angeles Fire Department has no jurisdiction in the City of Glendale.

L19 - Responses to Comments from Joe Valeriano, received August 29, 2020

L19-1 The comment conflates the Project which is the subject of this EIR with an expansion of the Scholl Canyon Landfill, which is not part of the Project; The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.

L20 - Responses to Comments from Susan Hunt, received August 30, 2020

L20-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L20-2 Please refer to Topical Response No. 9.

L20-3 Please refer to Topical Response No. 5.

L20-4 Please refer to Topical Response No. 6.

L20-5 Please refer to Topical Response No. 8.

L20-6 The commenter requests consideration of Alternative 2, converting LFG to natural gas. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis and consideration of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. The objective of the proposed Project is to safely capture and incinerate all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Section 5.6.5 of the Draft EIR includes a comparison of the Project with alternatives evaluated. Please also refer to Topical Response No. 10. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L21 - Responses to Comments from Amy G Koss, received August 31, 2020

L21-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L21-2 This comment is a general statement about current environmental conditions in Glendale. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 5 for additional discussion of air quality.



L21-3 This comment is a general statement about current environmental conditions in Glendale. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L21-4 This comment is a general statement about current environmental conditions in Glendale. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 9 for additional discussion of fire hazards.

L21-5 This comment is a general statement about current environmental conditions in Glendale. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 6 and 9.

L21-6 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis and consideration of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Response No. 10.

L22 - Responses to Comments from Janise and Eduardo Escobar, received August 31, 2020

L22-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L22-2 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than continuing to flare the LFG, the proposed Project seeks to beneficially use the LFG for power generation utility at the Scholl Canyon Landfill to assist the City in meeting and

exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation.

L22-3 Please refer to Topical Responses No. 7 and 9.

L22-4 Please refer to Topical Response No. 5.

L22-5 Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significant cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Responses No. 1, 4, 5, 6, 8, and 9.

L22-6 Please refer to Topical Response No. 8.

L22-7 Methane gas is a naturally occurring byproduct of landfills and will continue to be generated for many years, well after landfill closure as waste materials continue to decompose. The Project objective is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Response No. 1.

L22-8 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis and consideration of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Responses No. 5, 7, and 10.

L23 - Responses to Comments from Janise and Eduardo Escobar, received August 31, 2020

L23 This is a duplicate comment letter received separately from the original submission. Please see responses to comments to L22 from Janise and Eduardo Escobar, received August 31, 2020.

L24 - Responses to Comments from Philip Lee, received August 31, 2020

L24-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L24-2 Please refer to Topical Response No. 5.

L24-3 Please refer to Topical Response No. 8.

L25 - Responses to Comments from Stephanie Schus Russin, received August 31, 2020

L25-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L25-2 Please refer to Topical Responses No. 4, 5, 8, and 9.

L25-3 Please refer to Topical Response No. 5.

L25-4 Flares are proposed to be replaced by Los Angeles County Sanitation District. The City of Glendale is not the Lead Agency for the flare replacement project. This comment has been forwarded to Los Angeles County Sanitation District.

L25-5 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L26 - Responses to Comments from Becky Newman, received September 1, 2020

L26-1 Please refer to Topical Response No. 9.

L26-2 Please refer to Topical Response No. 1.

L26-3 The commenter expresses general concerns over potential environmental impacts of the Project. Please refer to Section 4.0, Environmental Impact Analysis, of the Draft EIR for an analysis of potential environmental impacts of the Project. Please also refer to Topical Responses No. 1, 4, 5, 6, 8, and 9.

L26-4 The commenter requests additional consideration of alternatives, primarily Alternative 2, converting LFG to natural gas. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis and consideration of project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the project objectives, reduce project impacts is some areas, and will assist in informed decision-making. Please also refer Section 5.4 of the Draft EIR for a discussion of why individual project alternatives were not selected for further analysis. Please also refer to Topical Responses No. 2 and 10.

RESPONSE TO COMMENTS

L26-5 Please refer to Topical Response No. 2.

L26-6 The Project is a use permitted by the City of Glendale General Plan and Zoning Ordinance. The Scholl Canyon Landfill is currently operating with a Conditional Use Permit. Please also refer to Topical Responses No. 1 and 4.

L26-7 Please refer to Topical Responses No. 1 and 4.

L26-8 Please refer to Topical Response No. 5.

L26-9 Please refer to Topical Response No. 6.

L26-10 Please refer to Topical Response No. 9.

L26-11 Please refer to Topical Responses No. 1, 4, and 5. Please also refer to Section 4.2, Air Quality, of the Draft EIR for emission summaries during Project construction and operation and Section 5.4, Alternatives Considered and Not Selected for Further Analysis, of the Draft EIR for a discussion of why individual project alternatives were not selected for further analysis. Please also refer to Topical Response No. 10.

L26-12 Please refer to Topical Response No. 4. See Project Description in the Draft EIR. The “engines” are not forty feet tall.

L26-13 Please refer to Table 24 of Section 4.3, Biological Resources, of the Draft EIR for a list of Known and Potential Occurrence of Special-Status Wildlife within the Biological Study Area. When evaluating the threshold of “Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites?”, the impact analysis determined that although species would be disrupted during certain activities, impacts to wildlife movement and migratory corridors from the proposed Project would not be significant. Please refer to Section 4.3 of the Draft EIR for additional information regarding biological resources.

L26-14 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the project objectives, reduce project impacts is some areas, and will assist in informed decision-making. The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Response No. 10.

L26-15 Please refer to Topical Response No. 5 for updated greenhouse gas emissions estimates of the Project. These estimates reflect an assumed increase in the available volume of LFG. The LFG would either be combusted in flares or the reciprocating internal combustion engines. The Project’s potential greenhouse gas emissions impacts are

based on the combustion of all the available LFG. All LFG combusted by the reciprocating internal combustion engines would be LFG no longer combusted in flares under exiting conditions. The Project's potential increase in greenhouse gas emissions and determination of potential climate change impacts is accurate in charactering the change from baseline to proposed conditions. As shown in Topical Response No. 5, the Project's potential climate change impacts would be less than significant regardless if LFG was assumed to be combusted in the flares at Scholl Canyon Landfill or boilers at Grayson Power Plant as baseline conditions for the EIR.

L26-16 Please refer to Topical Responses No. 6, 7, and 9.

L26-17 Please refer to Section 4.5, Geology and Soils, Section 4.7, Hazards and Hazardous Materials, and Section 4.8, Hydrology and Water Quality of the Draft EIR for information regarding the Stormwater Pollution Prevention Plan (SWPPP), which includes best management practices (BMPs) to regulate stormwater runoff, prevent soil erosion, and address material handling and hazardous material management, as required by the Construction General Permit. BMPs identified in the proposed Project SWPPP will be implemented during Project construction to minimize the risk of an accidental release of hazardous materials and to provide the necessary information for emergency response should it be needed.

Please also refer to the Mitigation Measures *HAZ-1* through *HAZ-4*, discussed in Section 4.7 of the Draft EIR for information regarding hazardous containment procedures.

L26-18 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.

L26-19 Please refer to Topical Response No. 8.

L26-20 Please refer to Topical Response No. 8.

L26-21 The additional detailed information requested by the commenter would not change the analysis of Project environmental impacts in the Draft EIR and is not required by CEQA.

For information regarding the natural gas pipeline please refer to Section 2.3, Description of the Proposed Project of the Draft EIR.

L26-22 Please refer to Response L26-4.

L27 - Responses to Comments from Department of Resources Recycling and Recovery (CalRecycle), received September 1, 2020

L27-1 This comment introduces an attached comment letter submitted on behalf of CalRecycle.

L27-2 The comment summarizes the Project Description and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L27-3 The comment requests that addressed comments are reflected throughout the Final EIR. If revisions are necessary, they will be made in the Final EIR.

L27-4 The word "Exiting" was misspelled and should be "Existing". This will be corrected in the errata to the Final EIR prior to certification.

L27-5 The instances identified of the references to Appendix H should be references to Appendix J, Noise Modeling and Data Collection Sheets. This reference will be corrected in the errata to the Final EIR prior to certification.

L27-6 If the Project is approved, following approval and prior to the start of operation, the proposed Project will be adequately described in the Joint Technical Document (JTD) for the Scholl Canyon Landfill. Per Title 27, California Code of Regulations (27 CCR), Section 21620, the operator will submit proposed changes in design or operation to the Local Enforcement Agency (LEA) for review and approval at least 180 days prior to implementation.

L27-7 CalRecycle will receive copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed Project.

L27-8 CalRecycle will receive notice of any public hearing and/or decision regarding the Project a minimum of 10 days in advance.

L27-9 If there are any questions regarding the submitted comments the provided email address will be contacted.

L28 - Responses to Comments from Larry and Laurel Haltum, received September 1, 2020

L28-1 Please refer to Topical Responses No. 6 and 9.

L28-2 Please refer to Topical Responses No. 5, 6, and 7.

L28-3 Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significant cancer risks, to non-cancer acute risks, or to non-cancer chronic risks. Please also refer to Topical Response No. 5.

L28-4 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L29 - Responses to Comments from Marie-Ange Vuillemin, received September 1, 2020

L29-1 The comment is a general statement about the commenter's opinions about Glendale's air quality and does not make specific reference to the Biogas Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L30 - Responses to Comments from Randy Glass, received September 1, 2020

L30-1 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than continuing to flare all the LFG, the proposed Project seeks to beneficially use the LFG for renewable electricity generation utility at the Scholl Canyon Landfill to assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation. Please refer to Section 4 of the Draft EIR for a discussion of the Project's potential environmental impacts.

L30-2 Please refer to Topical Response No. 5.

L30-3 Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significant cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Response No. 5

L31 - Responses to Comments from Gina Esposito, received September 2, 2020

L31-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significant cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Response No. 5.

L31-2 The commenter expresses general concerns over potential environmental impacts of the Project and states that they are not sufficiently discussed in the Draft EIR. Please refer to Topical Responses No. 1 through 10 for additional discussion regarding the Project's

potential environmental impacts. The Project does not involve a “business”. The Project is owned and will be operated by the City of Glendale.

L31-3 There is no “big business” involved in the construction, operation, or maintenance of the proposed Biogas Renewable Generation Project. It will be owned and operated by the City of Glendale. The commenter expresses concern over the location of the proposed Project stating that it is too close to residences. Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than continuing to flare all the LFG, the proposed Project seeks to beneficially use the LFG for renewable electricity generation utility at the Scholl Canyon Landfill to assist the City in meeting and exceeding State requirements for renewable energy generation. Scholl Canyon Landfill will continue to produce LFG for many years to come and that LFG is required to be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation. Please refer to Section 4 of the Draft EIR for a discussion of the Project’s potential environmental impacts

L31-4 Please refer to Topical Response No. 9.

L31-5 Please refer to Topical Responses No. 1, 5, 7, and 9.

L31-6 The comment expresses opposition to the expansion of the Scholl Power Plant. There is no existing Scholl Power Plant, accordingly it is not possible to expand something that does not exist. See the Project Description in the Draft EIR. The comment is a general statement about the commenter’s opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter’s statement is included in the Final EIR for the decision-maker’s consideration as part of the City’s deliberations on the Project.

L32 - Responses to Comments from Christine Holland, received September 3, 2020

L32-1 The comment is a general statement about the commenter’s opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter’s statement is included in the Final EIR for the decision-maker’s consideration as part of the City’s deliberations on the Project.

L32-2 The comment is a general statement about the commenter’s opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter’s statement is included in the Final EIR for the decision-maker’s consideration as part of

the City's deliberations on the Project. Please also refer to Topical Responses No. 5, 6, and 9.

L32-3 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L32-4 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L33 - Responses to Comments from Elizabeth Park, received September 3, 2020

L33-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 1, 5, and 7.

L34 - Responses to Comments from Jaime Borenstein, received September 3, 2020

L34-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L34-2 Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significant cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Response No. 5.

L34-3 Please refer to Topical Response No. 9.

L34-4 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than

continuing to flare the LFG, the proposed Project seeks to beneficially use the LFG for renewable electricity generation utility at the Scholl Canyon Landfill to assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation. Please refer to Section 4 of the Draft EIR for a discussion of the Project's potential environmental impacts. Please also refer to Topical Response No. 6.

L34-5 Please refer to Section 4.5, Geology and Soils, Section 4.7, Hazards and Hazardous Materials, and Section 4.8, Hydrology and Water Quality of the Draft EIR for information regarding the Stormwater Pollution Prevention Plan (SWPPP), which includes best management practices (BMPs) to regulate stormwater runoff, prevent soil erosion, and address material handling and hazardous material management, as required by the Construction General Permit. BMPs identified in the proposed Project SWPPP will be implemented during Project construction to minimize the risk of an accidental release of hazardous materials and to provide the necessary information for emergency response.

Please also refer to Topical Response No. 7 and the Mitigation Measures *HAZ-1* through *HAZ-4*, discussed in Section 4.7 of the Draft EIR for information regarding hazardous containment procedures.

L34-6 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the project objectives, reduce project impacts is some areas, and will assist in informed decision-making. Please also refer to Topical Response No. 10.

L35 - Responses to Comments from Karen King, received September 3, 2020

L35-1 These comments (L35-1 through L35-6) were originally submitted by Jaime Bornstein, received September 3, 2020. Please refer to responses to comments to L34.

L36 - Responses to Comments from Karen King, received September 3, 2020

This is a duplicate comment letter received separately from the original submission. Please see responses to comments to L35 from Karen King, received September 3, 2020.

L37 - Responses to Comments from Gregg and Summer Wiele, received September 4, 2020

L37-1 Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significant cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Response No. 5.

L37-2 Please refer to Topical Responses No. 1, 2, and 7.

L37-3 Please refer to Topical Responses No. 7 and 9.

L37-4 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than continuing to flare all of the LFG, the proposed Project seeks to beneficially use the LFG for renewable electricity generation utility at the Scholl Canyon Landfill to assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation. Please refer to Section 4 of the Draft EIR for a discussion of the Project's potential environmental impacts. Please also refer to Topical Response No. 7.

L38 - Responses to Comments from Gregg, Summer, and Brooklyn Wiele, received September 4, 2020

L38-1 This is a duplicate comment letter received separately from the original submission. Please see responses to comments to L37 from Gregg and Summer Wiele received September 4, 2020.

L39 - Responses to Comments from Donielle Lemone, received September 5, 2020

L39-1 Please refer to Topical Responses No. 1 and 9.

L39-2 Please refer to Topical Response No. 2.

L40 - Responses to Comments from Marwan and Amy Ataya, received September 6, 2020

L40-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L40-2 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. Scholl Canyon Landfill

naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than continuing to flare all of the LFG, the proposed Project seeks to beneficially use the LFG for renewable electricity generation utility at the Scholl Canyon Landfill to assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation. Please refer to Section 4 of the Draft EIR for a discussion of the Project's potential environmental impacts. Please also refer to Topical Response No. 7.

L40-3 Please refer to Topical Response No. 9.

L40-4 Please refer to Topical Response No. 5.

L40-5 Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significant cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Response No. 5.

L40-6 Please refer to Topical Response No. 8.

L40-7 Please refer to Topical Response No. 6.

L40-8 Please refer to Topical Response No. 4.

L40-9 Please refer to Topical Responses No. 1, 2, and 7.

L41 - Responses to Comments from Priscila Kasha, received September 6, 2020

L41-1 The commenter introduces themself and identifies her relationship to Glendale. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L41-2 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L41-3 Please refer to Topical Response No. 1.

L41-4 to L41-10 These comments were originally received from Becky Newman on September 1, 2020. Please refer to responses to comments to L26.

L41-11 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than continuing to flare all of the LFG, the proposed Project seeks to beneficially use the LFG for renewable electricity generation utility at the Scholl Canyon Landfill to assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation. Please refer to Section 4 of the Draft EIR for a discussion of the Project's potential environmental impacts. Please also refer to Topical Response No. 7.

L41-12 to L41-14 These comments were originally received from Becky Newman on September 1, 2020. Please refer to responses to comments to L26.

L41-15 Please refer to Topical Response No. 9.

L41-16 Please refer to Topical Response No. 7.

L41-17 to L41-26 These comments were originally received from Becky Newman on September 1, 2020. Please refer to responses to comments to L26.

L41-27 The additional detailed information requested by the commenter would not change the analysis of Project environmental impacts in the Draft EIR and is not required by CEQA. For information regarding the natural gas pipeline please refer to Section 2.3, Description of the Proposed Project, of the Draft EIR. No transmission lines will be constructed for the proposed Project. Existing transmission lines will be utilized to connect the electric generating equipment to the local grid.

L41-28 This comment was originally received from Becky Newman on September 1, 2020. Please refer to Response L26.

L41-29 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 10.

L42 - Responses to Comments from Wyndham Chow, received September 6, 2020

L42-1 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Response No. 10.

L43 - Responses to Comments from Emily Koss, received September 7, 2020

L43-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 7 and 9.

L44 - Responses to Comments from Marguerita Drew, received September 7, 2020

L44-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L44-2 Please refer to Topical Responses No. 5 through 9.

L44-3 Please refer to Topical Responses No. 7 and 9.

L44-4 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L44-5 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L44-6 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's

statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L45 - Responses to Comments from Aida Galusian, received September 8, 2020

L45 These comments (L45-1 through L45-8) were originally submitted by Marwan and Amy Ataya, received September 6, 2020. Please refer to Response L40.

L46 - Responses to Comments from Orbel Minassian, received September 8, 2020

L46 These comments (L46-1 through L46-8) were originally submitted by Marwan and Amy Ataya, received September 6, 2020. Please refer to Response L40.

L47 - Responses to Comments from Sharice B. Marootian, received September 8, 2020

L47-1 Please refer to Topical Responses No. 1, 5, 7, and 9.

L48 - Responses to Comments from Talin Minassian, received September 8, 2020

L48 These comments (L48-1 through L48-8) were originally submitted by Marwan and Amy Ataya, received September 6, 2020. Please refer to ResponseL40.

L49 - Responses to Comments from Teni Shahnazarian, received September 8, 2020

L49 These comments (L49-1 through L49-8) were originally submitted by Marwan and Amy Ataya, received September 6, 2020. Please refer to Response L40.

L50 - Responses to Comments from Erika Kraetsch, received September 9, 2020

L50-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L50-2 to
L50-6 These comments were originally submitted by Jaime Borenstein, received September 3, 2020. Please refer to Response L34.

L51 - Responses to Comments from Kate DiRienzo-Payne, received September 9, 2020

L51-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L51-2 Please refer to Topical Response No. 1.

L51-3 Based on the results of the health risk assessment, shown in Tables 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significance cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Responses No. 1, 5, 7, and 9.

L51-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L52 - Responses to Comments from Angela Cohen, received September 10, 2020

L52-1 Please refer to Topical Responses No. 4, 5, and 8.

L52-2 Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significance cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Responses No. 1, 5, and 7.

L52-3 Please refer to Topical Response No. 4.

L53 - Responses to Comments from Allen St. John, received September 10, 2020

L53-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L54 - Responses to Comments from Ann Reed, received September 10, 2020

L54-1 Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significance cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Responses No. 5 and 7.

L55 - Responses to Comments from Brian Newlin, received September 10, 2020

L55-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's

statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L55-2 Please refer to Topical Response No. 5.

L55-3 Please refer to Topical Response No. 7.

L55-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L56 - Responses to Comments from Elan Borenstein, received September 10, 2020

L56-1 The commenter discusses the dangers of methane gas and the dangers of releasing methane gas into the atmosphere. Methane gas is a naturally occurring byproduct of active and inactive landfills. The Draft EIR discusses methane gas and the rules and regulations regarding its capture and control in Section 2.0, Project Description, Section 4.2, Air Quality, and Section 4.6, Greenhouse Gas Emissions. The Project objective is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity.

L56-2 Please refer to Topical Response No. 9.

L56-3 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the Project objectives, reduce Project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Please also refer to Topical Response No. 10.

L57 - Responses to Comments from Gary and Cheryl Hannah, received September 10, 2020

L57-1 Please refer to Topical Responses No. 4 and 8.

L57-2 Please refer to Topical Responses No. 5 and 7.

L58 - Responses to Comments from Isabella Meyer, received September 10, 2020

L58-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's

statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L58-2 Please refer to Topical Response No. 9.

L58-3 Please refer to Topical Responses No. 6 and 7. Please also refer to the Mitigation Measures *HAZ-1* through *HAZ-4*, discussed in Section 4.7 of the Draft EIR for information regarding hazardous containment procedures.

L58-4 Methane gas is a naturally occurring byproduct of active and inactive landfills. The Draft EIR discusses methane gas and the rules and regulations regarding its capture and control in Section 2.0, Project Description, Section 4.2, Air Quality, and Section 4.6, Greenhouse Gas Emissions. The Project objective is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Response No. 1.

L58-5 Please refer to Topical Responses No. 5 and 8.

L58-6 Please refer to Topical Response No. 4.

L59 - Responses to Comments from Jamie Kellum, received September 10, 2020

L59-1-5 The comments (L59-1 through L59-5) were originally submitted by Marwan and Amy Ataya, received September 6, 2020. Please refer to responses to comments to L40.

L59-6 The commenter's statement expresses support for Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the project objectives, reduce project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Please also refer to Topical Response No. 10.

L60 - Responses to Comments from John and Caroline Weiner, received September 10, 2020

L60-1 Please refer to Topical Responses No. 5, 6, and 9.

L60-2 Please refer to Topical Responses No. 5 and 8.

L60-3 Please refer to Topical Response No. 8.

L60-4 Please refer to Section 4.3, Biological Resources, of the Draft EIR for an analysis of biological impacts of the Project and associated mitigation measures that will be implemented to reduce impacts.

L60-5 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L61 - Responses to Comments from Larry Moorehouse, received September 10, 2020

L61-1 The comment is a general statement about the commenter's opinion and involvement in previous landfill activities not proposed as part of the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L61-2 The Project does not propose combustion of LFG in diesel engine generators.

L61-3 The power generation facility would operate on a fulltime basis but would not require full time on-site staffing. City staff would not always be present on the Project site because the power generation facility would be remotely monitored through a Supervisory Control and Data Acquisition (SCADA) system. The SCADA system includes software and hardware elements that would allow the equipment to be monitored and controlled from the remote locations. The proposed power generation facility would be remotely monitored using monitoring centers in Brea, California and Bristol, Pennsylvania. An alarm would be triggered at the power generation facility and remote monitoring locations in the event of an upset operating condition. The City's on-call staff would then be immediately notified and called-out for operation and maintenance support. Extensive hands-on training would be provided to City operators who will also have access to the monitoring system. If needed, in an emergency, the engines can be completely shut off manually or via remote access.

L61-4 The Project does not propose combustion of LFG in diesel engine generators.

L61-5 The permits and approvals anticipated to be required for the Project are described in Section 1.4 of the Draft EIR. The City will be required to obtained all of the permits and approvals anticipated to be required for Project implementation.

L61-6 All waste generated from Project implementation would be handled in accordance with applicable federal, state, and local regulatory requirements.

L61-7 The engines will be inside enclosures. See Draft EIR Section 2.3.1 (Power Generation Facility) of the Project Description. An overhead crane is not proposed or necessary for routine engine maintenance.

L61-8 The City will maintain the engines with support from contracted specialists as needed.

L61-9 As described in the Final EIR, LFG may be combusted in the existing or future replaced flares while all four of the proposed engines are operating. Please refer to Topical Response No. 5.

L61-10 As described in Section 2.3.2 of the Draft EIR, the proposed engines would operate on a 90 percent LFG or greater fuel ratio.

L61-11 As described in Section 2.3.3 of the Draft EIR, the existing LFG pipeline from Scholl Canyon Landfill to Grayson Power Plant would be purged with an inert gas such as nitrogen and capped with cement plugs.

L61-12 The City will be responsible for handling the SCAQMD regulatory requirements for the reciprocating internal combustion engines used to generate renewable electricity with support from contracted specialists as needed.

L62 - Responses to Comments from Max and Lucilla Denuna, received September 10, 2020

L62-1 Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significance cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Response No. 5.

L62-2 Please refer to Topical Responses No. 5 and 8.

L62-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L63 - Responses to Comments from Valerie D., received September 10, 2020

L63-1 Please refer to Topical Responses No. 6, 7, and 9.

L63-2 Please refer to the Mitigation Measures *HAZ-1* through *HAZ-4*, discussed in Section 4.7 of the Draft EIR for information regarding hazardous containment procedures.

L63-3 Please refer to Topical Response No. 5.

L63-4 Please refer to Section 5.0, Alternatives, of the Draft EIR and Topical Response No. 2.

L63-5 Please refer to Topical Response No. 1.

L63-6 Please refer to Topical Response No. 1.

L64 - Responses to Comments from Shackeh Mastian, received September 11, 2020

L64-1 Please refer to Section 4.2, Air Quality, of the Draft EIR for the Toxic Air Contaminant emissions from the reciprocating internal combustion engines during Project operations.

L65 - Responses to Comments from Bethsaida (Betsy) Castillo-Cifuentes, received September 14, 2020

L65-1 The commenter introduces herself and identifies her relationship to Glendale. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L65-2 The commenter directly reiterates comments submitted by Priscila Kasha on September 6, 2020. Please refer to responses to comments of L41 from Priscila Kasha, received September 6, 2020. Please also refer to Topical Response No. 10.

L66 - Responses to Comments from Claudia Sysock, received September 14, 2020

L66-1 Please refer to Topical Responses No. 7 and 9.

L66-2 Please refer to Topical Response No. 5.

L67 - Responses to Comments from E. Nevins, received September 14, 2020

L67 The comments (L67-1 through L67-3) reiterate comments originally submitted by Marwan and Amy Ataya, received September 6, 2020. Please refer to Response L40.

L67-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L68 - Responses to Comments from Ferrari, received September 14, 2020

L68-1 The comments (L68-1 through L68-3) reiterate comments originally submitted by Marwan and Amy Ataya, received September 6, 2020. Please refer to Response L40.

L69 - Responses to Comments from Flora Corin, received September 14, 2020

L69-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's

statement regarding property value impacts of the Project is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L69-2 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. However, the Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than continuing to flare all the LFG, the proposed Project seeks to beneficially use the LFG for power generation utility at the Scholl Canyon Landfill to assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation. Please refer to Section 4 of the Draft EIR for a discussion of the Project's potential environmental impacts.

L69-3 Please refer to Topical Response No. 6.

L69-4 Methane gas is a naturally occurring byproduct of active and inactive landfills. The Project objective is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Response No. 7.

L70 - Responses to Comments from Frances F. Coburn, received September 14, 2020

L70-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L70-2 Please refer to Topical Response No. 5.

L70-3 Please refer to Topical Response No. 5.

L70-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L71 - Responses to Comments from Monica Lago-Kaytis, received September 14, 2020

L71-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L71-2 to L71-6 The comments (L71-2 through L71-6) reiterate comments previously submitted by Marwan and Amy Ataya on September 6, 2020. Please refer to responses to comments of L40 from Marwan and Amy Ataya, received September 6, 2020.

L71-7 Please refer to Topical Responses No. 1, 2, and 10. The Project is a use permitted by the City of Glendale General Plan and Zoning Ordinance. The commenter requests consideration of Alternative 2, converting LFG to natural gas. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis and consideration of project alternatives required for an EIR under the CEQA Guidelines.

L72 - Responses to Comments from Omar Mauricio Cifuentes, received September 14, 2020

L72-1 The commenter introduces himself and identifies his relationship to Glenoaks Canyon. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L72-2 to L72-29 The remaining comments within this letter (L72-2 through 29) directly reiterate comments previously submitted by Priscila Kasha on September 6, 2020. Please refer to Response L41 from Priscila Kasha, received September 6, 2020. Please also refer to Topical Response No. 10.

L73 - Responses to Comments from Dora Herrera, received September 16, 2020

L73-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L73-2 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis and consideration of project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the project objectives, reduce project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated

by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate power. Please also refer to Topical Responses No. 1, 2, and 10.

L74 - Responses to Comments from Nancy Wise, received September 16, 2020

L74-1 The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate power.

L74-2 Please refer to Topical Responses No. 1, 2, and 7.

L74-3 Please refer to Topical Response No. 2.

L74-4 Please refer to Topical Responses No. 2 and 4.

L74-5 Please refer to Topical Response No. 1.

L74-6 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L74-7 The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Response No. 2.

L75 - Responses to Comments from Rafael Hernandez, received September 16, 2020

L75-1 to L75-8 The comments within this letter (L75-1 through 8) directly reiterate comments previously submitted by Marwan and Amy Ataya on September 6, 2020. Please refer to responses to comments of L40 from Marwan and Amy Ataya, received September 6, 2020.

L75-9 The commenter's statement expresses support for Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the Project objectives, reduce Project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Please also refer to Topical Response No. 10.

L76 - Responses to Comments from Randall Wise, received September 16, 2020

L76 The comments within this letter (L76-1 through L76-7) directly reiterate comments previously submitted by Nancy Wise on September 16, 2020. Please refer to responses to comments to L74 from Nancy Wise, received September 16, 2020.

L77 - Responses to Comments from Richard Espinosa, received September 16, 2020

L77-1 The commenter's statement expresses support for Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the project objectives, reduce project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Please also refer to Topical Response No. 10.

L78 - Responses to Comments from Shirley Woo, received September 16, 2020

L78-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 1, 2, and 7.

L78-2 to L78-4 The comments (L78-2 through L78-4) reiterate comments previously submitted by Marwan and Amy Ataya on September 6, 2020. Please refer to responses to comments of L40 from Marwan and Amy Ataya, received September 6, 2020.

L78-5 The commenter's statement expresses support for Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the project objectives, reduce project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Please also refer to Topical Response No. 10.

L79 - Responses to Comments from Cindy Swensen, received September 17, 2020

L79 The comments within this letter (L79-1 through L79-7) reiterate comments previously submitted by Marwan and Amy Ataya on September 6, 2020. Please refer to responses to comments of L40 from Marwan and Amy Ataya, received September 6, 2020.

L80 - Responses to Comments from Michael Mallory, received September 19, 2020

L80-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 1, 2, and 7.

L80-2 Please refer to Topical Responses No. 6, 7, and 9.

L80-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L80-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L80-5 Please refer to Topical Responses No. 1, 2, and 7.

L81 - Responses to Comments from Richard Schmittdiel, received September 21, 2020

L81-1 The comment is a general statement expressing the commenter's support of the Project. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L81-2 The comment is a general statement expressing the commenter's support of the Project. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L81-3 The comment is a general statement expressing the commenter's support of the Project. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L82 - Responses to Comments from Joan Morris, received September 22, 2020

RESPONSE TO COMMENTS

L82-1 The comment introduces the comments in the letter. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L82-2 Please refer to Topical Response No. 4.

L82-3 Please refer to Topical Responses No. 1, 2, and 10. The Project is a use permitted by the City of Glendale General Plan and Zoning Ordinance. The comment is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the Project objectives, reduce Project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill.

L82-4 Please refer to Topical Response No. 1.

L82-5 Please refer to Topical Responses No. 1 and 4.

L82-6 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the Project objectives, reduce Project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Please also refer to Topical Response No. 10.

L82-7 Please refer to Topical Response No. 4.

L82-8 Please refer to Topical Response No. 4.

L82-9 Please refer to Topical Response No. 8.

L82-10 Please refer to Topical Response No. 4.

L82-11 Please refer to Topical Responses No. 1 and 4.

L82-12 The additional detailed information requested by the commenter would not change the analysis of Project environmental impacts in the Draft EIR and is not required by CEQA. Please also refer to Topical Responses No. 1 and 4.

L82-13 Please refer to Topical Responses No. 1 and 4.

L82-14 Please refer to Topical Response No. 7. The Draft EIR evaluates the baseline conditions at the time the Notice of Preparation was published. Because it is not known with exactitude when the landfill will close best estimates have been given based on the best available data at this time. After the Scholl Canyon Landfill closes (and that may occur in phases as with prior portions of the land fill), it is unknown how long the property transfer from the County of Los Angeles to the City of Glendale will take; it is also unknown what type of recreational improvements will be made and where the future recreational/open space development will occur and when such development will be approved and implemented. Accordingly, assessing future unknown conditions is at best speculative, and CEQA does not require speculation.

L82-15 Please refer to Topical Response No. 9.

L82-16 Please refer to Topical Responses No. 1, 2, and 5.

L82-17 The commenter's statement expresses support for Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 2, 6, 7, and 8.

L82-18 The commenter's statement expresses support for Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L83 - Responses to Comments from Amaly Avakian, received September 23, 2020

L83-1 to
L83-8 The comments within this letter (L83-1 through L83-8) directly reiterate comments previously submitted by Marwan and Amy Ataya on September 6, 2020. Please refer to responses to comments of L40 from Marwan and Amy Ataya, received September 6, 2020.

L83-9 The commenter's statement expresses support for Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L84 - Responses to Comments from Coalition for Scholl Landfill Alternatives (CSLA), received September 23, 2020

L84-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L84-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or

CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L84-3 Please refer to Topical Response No. 9.

L84-4 Please refer to Topical Response No. 5.

L84-5 Please refer to Topical Response No. 6.

L84-6 Please refer to Topical Response No. 2.

L84-7 Please refer to Topical Response No. 1.

L84-8 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L85 - Responses to Comments from Renee Holt, received September 23, 2020

L85-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 5.

L85-2 Please refer to Topical Responses No. 7 and 9.

L85-3 Please refer to Topical Response No. 6.

L85-4 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. However, the Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than continuing to flare all the LFG, the proposed Project seeks to beneficially use the LFG for power generation utility at the Scholl Canyon Landfill to assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation.

L85-5 The commenter discusses the dangers of methane gas and the dangers of releasing methane gas into the atmosphere. Methane gas is a naturally occurring byproduct of

active and inactive landfills. The Draft EIR discusses methane gas and the rules and regulations regarding its capture and control in Section 2.0, Project Description, Section 4.2, Air Quality, and Section 4.6, Greenhouse Gas Emissions. The Project objective is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity.

The commenter's statement expresses support for Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the Project objectives, reduce Project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Please also refer to Topical Response No. 10.

L86 - Responses to Comments from Sharon McDonald, received September 23, 2020

L86-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L86-2 Please refer to Topical Response No. 9.

L86-3 The commenter's statement expresses support for Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L86-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L86-5 Please refer to Topical Responses No. 5, 6, 8, and 9.

L86-6 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L87 - Responses to Comments from Alice Ryu, received September 24, 2020

L87-1 Please refer to Topical Responses No. 1, 5, and 7.

L87-2 The EIR's analysis of potential environmental impacts is not solely limited to the geographic borders of the City of Glendale. For example, Sections 4.1 (Aesthetics), 4.10 (Noise), 4.11 (Transportation) discuss potential environmental impacts outside the City of Glendale. The Project's potential air quality (Section 4.2) and greenhouse gas emissions (Section 4.6) impacts are additionally analyzed on a regional and global scale.

L87-3 Comments from Los Angeles City Council District 14 were submitted on September 25, 2020 and are included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Response L95.

L88 - Responses to Comments from Joan Morris, received September 24, 2020

L88-1 This is a duplicate comment letter received separately from the original submission. Please see responses to comments to L82 from Joan Morris, received September 22, 2020.

L89 - Responses to Comments from Linda Goodman Pillsbury, received September 24, 2020

L89-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L89-2 Please refer to Topical Response No. 9.

L89-3 Please refer to Topical Response No. 5.

L89-4 Please refer to Topical Response No. 6.

L89-5 Please refer to Topical Responses No. 1, 5, and 8.

L89-6 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.

L89-7 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's

statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L89-8 The commenter's statement expresses support for Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the Project objectives, reduce Project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Please also refer to Topical Response No. 10.

L90 - Responses to Comments from Randall and Rowena Abarro, received September 24, 2020

L90-1 to
L90-8 The comments within this letter (L90-1 through L90-8) directly reiterate comments previously submitted by Marwan and Amy Ataya on September 6, 2020. Please refer to responses to comments of L40 from Marwan and Amy Ataya, received September 6, 2020.

L90-9 The commenter's statement expresses support for Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L91 - Responses to Comments from Sylvia Denlinger, received September 24, 2020

L91-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L91-2 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the Project objectives, reduce Project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Please also refer to Topical Response No. 10.

L91-3 The Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from

the SCAQMD. Rather than continuing to flare all the LFG, the proposed Project seeks to beneficially use the LFG for power generation utility at the Scholl Canyon Landfill to assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation. Please also refer to Topical Response No. 5.

L92 - Responses to Comments from Virginia L Melin, received September 24, 2020

L92-1 Section 15126.6(d) of the State CEQA Guidelines states that alternatives analysis need not be presented in the same level of detail as the assessment of the proposed Project. Rather, the EIR is required to provide sufficient information to allow for meaningful evaluation, analysis, and comparison with the proposed Project. If an alternative would cause one or more significant impacts in addition to those of the proposed Project, analysis of those impacts is to be discussed, but in less detail than for the proposed Project. Please also refer to Topical Response No. 10.

L93 - Responses to Comments from Bill Fritz, received September 25, 2020

L93-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L93-2 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. However, the Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than continuing to flare all of the LFG, the proposed Project seeks to beneficially use the LFG for power generation utility at the Scholl Canyon Landfill to assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation.

Please also refer to Topical Responses No. 7 and 9.

L93-3 Please refer to Topical Response No. 6.

L93-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's

statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L94 - Responses to Comments from City of Los Angeles Sanitation & Environment (LASAN), received September 25, 2020

L94-1 If there are any questions regarding the submitted comments the provided phone number will be contacted.

L94-2 The comment introduces the order of comments presented in the letter and is intended to be informative in nature.

L94-3 The comment provides a background of the proposed Project and associated environmental documents and decisions. It is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L94-4 The health risk assessment was prepared in accordance with the Office of Environmental Health Hazard Assessment (OEHHA) Guideline and SCAQMD Risk Assessment Procedures for Rule 1401, 1401.1 and 212. As described in the submitted HRA protocol to AQMD (Appendix B.3.1 of Draft EIR), the receptor grid covers an approximate area of 36 square kilometers with 50 meters spacing between receptors. The receptor grid includes the Eagle Rock residents near the southern boundary property of the landfill. The health risk assessment results, as discussed in the Draft EIR, are below the significance threshold for any receptors outside the landfill property boundary. Receptors located further away from the Project site and outside the receptor grid considered in the Draft EIR would be exposed to even lower potential health risks than receptors inside the receptor grid.

L94-5 Please refer to Topical Response No. 5 for dioxin and furan emissions.

L94-6 Hexavalent chromium, arsenic, and nickel emissions were included in the City of Glendale, Glendale Water and Power AB2588 Report dated July 2018. Toxic pollutant emissions were calculated using SCAQMD reference value toxic air contaminants (TAC) emission factors for LFG combusted in the boilers. Reference values may reflect data from multiple landfills with different gas characteristics and serve as a conservative assessment of worst-case emissions and these compounds were not detected in laboratory analyses of gas produced at Scholl Canyon Landfill. TAC emissions from the internal combustion engines and flares may differ from those of boilers due to different combustion technologies. Based upon practice and SCAQMD emission factor reference data for LFG when combusted in engines, hexavalent chromium, arsenic, and nickel emissions are not expected from LFG combustion in engines. The 2010 LFG analysis and the AB2588 Hot Spots risk assessment for the Grayson Power Plant boilers that operated on LFG does not show hexavalent chromium, arsenic, and nickel. Additionally, the Project includes an advanced fuel conditioning and siloxane removal systems that are designed to remove impurities, including solid materials, from the LFG.



L94-7 The health risk assessment was conducted based on 100 percent LFG operated at the proposed equipment. TAC emissions from the LFG combustion were calculated based on the lab analytical results from Scholl Canyon gas samples, USEPA AP-42, CARB California Air Toxics Emission Factor clearing house report on formaldehyde, and dioxin/furan lab data from boiler exhaust collected at Grayson Power Plant. Please also refer to Topical Response No. 5.

L94-8 The commenter concludes that the City is improperly relying on the GMC exemption for utility projects because there is "no division of subdivision of land…"; however, this conclusion is incorrect. Title 16, section 16.08.010 entitled Primary Ridgeline – Preservation", applies to more than tract maps or parcel maps, it also applies to "…*building plans, and grading plans* for *any property* with primary ridgelines within its boundaries shall include provisions for the complete preservation of such primary ridgeline areas in their natural state." (Emphasis added). (GMC §16.08.010 (B) entitled "Applicability" included below in its entirety). The applicability of the Primary Ridgeline Preservation provisions to grading and building plans as well as tract and parcel maps fulfills the purpose of primary ridgeline preservation otherwise primary ridgelines could be impacted by grading or building activities not associated with a tract or parcel map. Moreover, Title 30 (Zoning), Section 30.15.040.E, which sets for the development standards for the SR zone states:

"E Regulations in Major Ridgeline Areas, Secondary Ridgeline Areas, and Blue-Line Stream Areas. All subdivisions, development, building, construction, and grading in the SR Zone shall be regulated by Sections 16.04.030, 16.04.003, and 16.04.037 of this code as related to major ridgeline areas, secondary ridgeline areas, and blue-line stream areas. Any exception to the standards contained in these sections shall only be made by the planning commission/city council at a public hearing."

For purposes of clarification and amplification, the entire GMC Section 16.08.010 governing primary ridgeline preservation reads as follows (with emphasis added):

"**16.08.010 Primary ridgeline areas—Preservation.**

A. Intent and Purpose. Primary ridgelines are the highest undeveloped and visually dominant ridgelines in a viewshed, recognized by the continuous horizon line formed against the sky. The primary ridgelines are an exhaustible and precious scenic resource of the city and its citizens worthy of preservation for the welfare of all the citizens of Glendale. As the hillsides of Glendale continue to be developed, proper planning is necessary to protect primary ridgelines from grading activities.

B. *Applicability. Tentative tract and parcel maps,* ***building plans, and grading plans*** *for any property with primary ridgelines within its boundaries shall include provisions for the complete preservation of such primary ridgeline areas in their natural state.*

C. Primary Ridgelines Area Defined. A primary ridgeline area shall be any ridgeline in the city so designated as “primary ridges”1 on Sheet Nos. OC, OD, 1C, 1D, 2C, 3C, 4A, 4B, 4C, 4D, 5B, 5C, 5D, 6B, 6C, 6D, 6E, 6F, 7B, 7C, 7D, 7E, 7F, 8B, 8C, 8D, BE, 8F, 8G, 9D, 9E, 9F, 9G, 10E, 10F and 10G of the Glendale, Los Angeles County, California, metropolitan area two hundred (200) scale topographic maps which are attached to the ordinance codified in this title, incorporated herein and by this reference made a part hereof.

D. Prohibitions. No grading, engineered slopes, housing construction, streets, utilities or other manmade features shall be permitted within identified primary ridgeline areas.

E. Exceptions. It is recognized that from time to time, it may be necessary for improved public street access or fire protection vehicle access to be taken across identified primary ridges to promote the public health, safety and general welfare, to ensure adequate traffic circulation, and to provide appropriate ingress and egress for emergencies. In such cases, the city council/planning commission may declare a need for a public street crossing a primary ridge, and all grading and improvement plans for such public street, including necessary accessory engineered slopes and utility extensions underneath the street, or fire road shall be subject to the approval of the city council/planning commission. Such declaration of need shall be made at a duly noticed and conducted public hearing and the city council/planning commission shall make supportive written findings that each of the following exists:

1. The location of the public street or fire road is proper in relation to adjacent uses, the development of the community and to the various elements and objectives of the general plan.

2. The public street or fire road will not be materially detrimental to the character of the neighborhood nor will it endanger the public health, safety and general welfare.

3. It has been demonstrated that the public street or fire road will improve and enhance traffic circulation in a manner advantageous to the public convenience and welfare, or that the fire road will improve hillside fire protection access to an area.

4. The establishment of the proposed public street or fire road will not impede the normal and orderly development and improvement of surrounding property for permitted uses.

5. The appearance of the proposed public street or fire road will not be so at variance with the appearance of adjoining ridgeline areas as to cause substantial depreciation of ridgeline appearance in the vicinity.

6. Adequate drainage devices, landscaping and other necessary appurtenances will be provided to city standards.

7. Alternative designs for street access have been evaluated and examined and have been determined to be infeasible.

F. Clustering of Development into Nonprohibited Areas. Where protection of environmental resources pursuant to subsection D of this section necessitates preserving portions of a parcel in an undeveloped state, the city shall permit a density transfer for those dwelling units that otherwise would be allowable pursuant to Chapter 30.11 of this code onto less sensitive portions of the parcel.

G. ***Utilities. Nothing in this section shall prohibit the maintenance, upgrading or improvement of existing public or quasi-public utilities which traverse identified primary ridges.***

H. Transmission Facilities. Radio wave transmission facilities which have obtained a conditional use permit under the provisions of Title 30 of this code shall be permitted within primary ridgeline areas.

I. Corrective Work. Nothing in this section shall prohibit the city council/planning commission from authorizing grading deemed necessary to correct existing natural hazardous conditions that are brought to the city's attention.

J. The determination that any specific property or portion thereof falls within the area described by subsection C of this section may be appealed pursuant to the city's uniform appeal procedure, Chapter 2.88 of this code. (Ord. 5683 § 2, 2009)."

Additionally, the commenter claims that exemption from the Primary Ridgeline Preservation protections "are distinct from the infrastructure required of the Project as issue." Section 16.08.010 (G) entitled "Utilities", states that "*Nothing in this section shall prohibit the maintenance, upgrading or improvement of existing public or quasi-public utilities which traverse identified primary ridges."*

GMC §15.04.010 (Title 15 entitled "Buildings and Construction"), defines Public Utility. A "Public utility means and includes, for the purposes of this chapter, the public service department of the city, fire and police divisions of the city as to fire and police signal systems, and any person owning, operating or maintaining overhead light, power, trolley, telephone, telegraph signal or other wires, street railway tracks or underground pipes, conduits or structures necessary for public service."

Further, GMC § 30.70.220, the definitions section of Title 30 (entitled "Zoning"), defines utility and transmission facilities as "…facilities for the production, storage, transmission, distribution, and recovery of water, sewage, energy, and other similar utilities."

Here, the Scholl Canyon Landfill and its supporting infrastructure are a necessary public service (collection and disposition of waste from the wasteshed). As part of its function, Scholl Canyon Landfill is required to collect and incinerate the naturally occurring LFG

(e.g., biogas) by-product of waste decomposition. LFG is collected through existing underground pipes which are connected to an on-site SCAQMD flaring system is part of the City's public utility system. The Project's purpose is to capture and incinerate the LFG and capture the energy by-product from such incineration for beneficial public use. The Project is a public utility project and by definition is eligible for the Primary Ridgeline Preservation exemption.

L94-9 Please refer to Topical Response No. 4 and see Response immediately above L94-8.

L94-10 The Commenter believes the City may not issue a Conditional Use Permit (CUP) for the Project but must rezone the site. The Commenter is incorrect. The Project is a conditionally permitted use in the Special Recreation zone. Specifically, sanitary landfills and related materials recovery operations, and utility and transmission facilities are conditionally permitted uses in the SR zone. Further, GMC § 30.70.220, defines utility and transmission facilities as "…facilities for the production, storage, transmission, distribution, and recovery of water, sewage, energy, and other similar utilities."

To amplify and clarify this fact, relevant portions of GMC Title 30 are included below, with emphasis. See specifically Table 30.15-A below:

"Chapter 30.15 SPECIAL PURPOSE DISTRICTS
30.15.010 Purpose.

D. SR (Special Recreation) Zone. The SR zone is intended as a zone for public and private open space and recreational uses and is intended to provide and protect open space, natural physical features and scenic resources in accordance with the comprehensive general plan of the city. Individual review of all uses and development is provided due to the unique and special characteristics of the variety of recreational uses possible in order to foster compatibility between uses and to protect the public health, safety and general welfare of the community. (Ord. 5807 § 2, 2013; Ord. 5399 Attach. A, 2004)

30.15.020 Special purpose district land uses and permit requirements.

A. Permitted Primary Uses and Structures. No building, structure or land shall be used and no building, structure or use in the special purpose zoning districts shall be erected, structurally altered, enlarged or established except the following permitted uses, buildings and structures identified with a "P" in Table 30.15-A.

B. Conditional Uses and Structures. The following uses and structures identified with a "C" in Table 30.15-A may be permitted in the special purpose zoning districts subject to approval of a conditional use permit (Chapter 30.42). The development standards of this zone shall apply except as otherwise provided herein.

C. Administrative Uses and Structures. The following uses and structures identified with an "A" in Table 30.15-A may be permitted in the special purpose zoning districts

subject to approval of an administrative use permit (Chapter 30.49). The development standards of this zone shall apply except as otherwise provided herein.

D. Temporary Uses. Temporary uses (identified with a "T" in Table 30.15-A), allowed subject to approval and compliance with all applicable provisions of this Zoning Code.

E. Permitted Accessory Uses and Structures. Accessory uses, buildings and structures shall be permitted in zones identified with a "P" in Table 30.15-A.

F. Wireless Telecommunications Facilities. Wireless telecommunications facilities, identified with a "W" in Table 30.15-A may be permitted subject to the approval of a wireless telecommunications facility permit as set forth in Chapter 30.48 of this code.

G. Standards for Specific Uses. Where the last column in the following tables ("See Standards in Section or Chapter") includes a section number, the regulations in the referenced section apply to the use; however, provisions in other sections of this Zoning Code may apply as well.

H. Uses Not Listed. In the CE and CEM zones only, land uses that are not listed on Table 30.15-A or are not shown in a particular zoning district are not allowed, except where other uses which the director of community development determines to be similar in nature, function and operation to listed permitted primary uses within these zones.

Table 30.15-A

SPECIAL PURPOSE DISTRICTS AND PERMIT REQUIREMENTS

LAND USE (1)(2)	PERMIT REQUIREMENT BY ZONE				See Standards in Section or Chapter
	CE	CEM	MS	SR	
Accessory Buildings, Structures and Uses					
Accessory dwelling unit (ADU), and/or junior accessory dwelling unit (JADU) on a lot developed with one residential dwelling unit			P		30.34.080
Accessory dwelling unit(s) (ADU), on a lot developed with more than one residential dwelling unit			P		30.34.080
Accessory use	P	P	P	P	
Accessory living quarters or guest house not to			P		

LAND USE (1)(2)	PERMIT REQUIREMENT BY ZONE				See Standards in Section or Chapter
	CE	CEM	MS	SR	
exceed an aggregate area of 500 sq. ft. of floor area					
Antennas (pole type) and flagpoles	P	P	P	P	
Auditoriums		P	P		
Caretaker's residences	P	P	P	P	
Carts (freestanding, nonmotorized, portable type)			P	P	30.34.040
Dish antennas	P		P	P	30.32.050
Home occupations			P		
Home-sharing			P		5.110
Manufacturing of containers for caskets, remains and flowers		P			
Mobile medical trailers, temporary			T(5)		
Museums		P			
Nurseries and garden supplies		P			
Reverse vending machines			P		30.12.040
Signs	P	P	P	P	30.33
Solar energy equipment	P	P	P	P	30.30.050
Agriculture, Open Space, and Resources					
Apiaries				P	
Open space/conservation areas				P	
Education, Public Assembly, Recreation—General					
Amphitheaters				P	
Aquariums				P	

LAND USE (1)(2)	PERMIT REQUIREMENT BY ZONE				See Standards in Section or Chapter
	CE	CEM	MS	SR	
Arboretums and botanical gardens				P	
Auditoriums				P	
Aviaries				P	
Bandstands				P	
Community gardens			P	P	
Golf courses, country clubs, driving ranges and related facilities				P	
Libraries				P	
Local fairs				P	
Museums				P	
Observatories				P	
Parks and playgrounds, private			P	P	
Places of worship			P	P(4)	
Public dances				P	
Recreational camps				P	
Riding academies or stables				P(3)	
Stables, including boarding of horses, sale or exchange of horses and horse rentals	P				
Swimming pools				P	
Education, Public Assembly, Recreation Within a Public Park					
Amphitheaters				P	
Aquariums				P	
Arboretums and botanical gardens				P	
Auditoriums				P	

LAND USE (1)(2)	PERMIT REQUIREMENT BY ZONE				See Standards in Section or Chapter
	CE	CEM	MS	SR	
Aviaries				P	
Bandstands				P	
Community center				P	
Community gardens				P	30.34.045
Convention centers				P	
Day care				A	
Golf courses, country clubs, driving ranges and related facilities				P	
Gymnasiums				P	
Libraries				P	
Local fairs				P	
Museums				P	
Observatories				P	
Parks and playgrounds, public				P	
Public dances				P	
Recreational camps				P	
Riding academies or stables				P(3)	
Swimming pools				P	
Institutional Uses					
Cultural arts centers			P		
Hospitals			P		
Museums			P		
Schools, physical instruction			C		
Schools, private			C		

LAND USE (1)(2)	PERMIT REQUIREMENT BY ZONE				See Standards in Section or Chapter
	CE	CEM	MS	SR	
Schools, private specialized education and training			C		
Light Industrial Uses					
Broadcasting studios and indoor support facilities—Productions			P		
Medical and dental laboratories			P		
Miscellaneous Uses					
Non-emergency heliport			P		
Parking lots			P		
Parking structures, subject to PS overlay required setback standards			P		30.23, 30.32.110
Office Uses					
Contractor's office and/or storage, temporary	T		T	T	
Contractor's office			P		
Medical and dental offices			P		
Office			P		
Office, consumer services			P		
Recreational Uses					
Children indoor play areas			P		
Cyber-café establishments			P		
Gyms and health clubs			P		
Indoor recreation center			P		
Private clubs and lodges			P		
Residential Uses					
Domestic violence shelter			P		
Emergency shelter			P		

LAND USE (1)(2)	PERMIT REQUIREMENT BY ZONE				See Standards in Section or Chapter
	CE	CEM	MS	SR	
Multiple residential dwelling units subject to provisions of the R-2250 zone			P		
One residential dwelling per lot subject to provisions of the R-2250 zone			P		
Residential congregate care living, limited			P		
Residential congregate care living, medical			P		
Residential congregate care living, non-medical			P		
Senior housing			P		
Retail Uses					
Alcoholic beverage sales			A	A	
Christmas tree sales lots, when maintained between November 1st and January 9th	T		T		5.44
Jewelry stores			P		
Liquor stores			C		
Pharmacy	P		P		
Pumpkin sales lots, when maintained between October 15th and November 1st	T		T		5.44
Restaurant, counter service with limited seating			P		
Restaurants, fast food			P		
Restaurants, full service			P		
Retail stores, general merchandise			P		

LAND USE (1)(2)	PERMIT REQUIREMENT BY ZONE				See Standards in Section or Chapter
	CE	CEM	MS	SR	
Western retail and supply stores	P				
Service Uses					
Ambulance services			P		
Banks and financial institutions			P		
Business support services			P		
Cemeteries		P			
Day care centers			P		
Gas station			P		
Hotels and motels			P		
Kennel and animal boarding	P			C	
Massage establishment			C		5.64
Mortuaries and funeral homes			P		
Personal services			P		
Repair and maintenance, consumer products			P		
Sanitary landfills and related recovery of materials	-	-	-	***C***	-
Transportation and Communications Uses					
Utility and transmission facilities	***C***	***C***	***C(6)***	***C***	
Wireless telecommunication facilities	W	W	W	W	30.48

Key to Permit Requirements	Symbol	See Chapter
Permitted use	P	

Key to Permit Requirements	Symbol	See Chapter
Administrative use—Administrative use permit required	A	30.49
Conditional use—Conditional use permit required	C	30.42
Temporary use	T	
Wireless telecommunications facilities permit required	W	30.48
Use not allowed		

Notes:

(1) See Section 30.03.010 regarding uses not listed.

(2) See Chapter 30.70 for definitions of the land uses.

(3) Not to be located nearer than 1/2 mile to the R1, R1R, ROS, R-3050, R-2250, R-1650 and R-1250 zones on which there is no H overlay zone.

(4) Places of worship in the SR zone must have been in existence as of September 26, 2006.

(5) Temporary mobile medical trailers must be used on a hospital site and are limited to a period of 2 years.

(6) See Section 30.15.060 for additional standards.

30.15.030 Special purpose district general development standards.

Table 30.15-B

SPECIAL PURPOSE DISTRICTS GENERAL DEVELOPMENT STANDARDS

Development Feature	Requirement by Zoning District			
	CE	CEM	MS	SR
Minimum Site Size	N/A	20 acres minimum	N/A	N/A
Residential Density Maximum	N/A		1 dwelling unit for each 2,250 sq. ft. of lot area. On lots having a width of 90 feet or greater, there shall be not more than 1 dwelling unit for each 1,800 sq. ft. of lot area.	N/A
Lot Coverage (2)	N/A		Lots with 1 dwelling unit and lots with multiple residential dwelling units: 50 percent maximum including all accessory buildings. All other uses: N/A	N/A
Minimum Setbacks Required (2)	See Section 30.30.050 f		Hospital: N/A	N/A

Development Feature	Requirement by Zoning District			
	CE	CEM	MS	SR
	or setback exceptions		1 dwelling unit or multiple residential dwelling units shall be subject to the R-2250 standards (3) All other uses shall be subject to C3 Standards (4)	
Street Front	25 feet	N/A		N/A
Street Side	5 feet	N/A		N/A
Interior not adjacent to residential zones	None	N/A		N/A
Interior adjacent to residential zones	N/A	N/A	10 feet	N/A
Maximum Height Limit (1)(2)(3)	35 feet	N/A	Properties with a frontage less than 90′ have a maximum height limit of 26′ District I—Properties with a frontage exceeding 90′ have a maximum height limit of 41′ District II—Properties with a frontage exceeding 90′ have a maximum height of 50′ District III—Properties with a frontage exceeding 200′ have a maximum height of 90′	N/A
Landscaping (2)	As required by Chapter 30.31 (Landscaping)	N/A	As required by Chapter 30.31 (Landscaping)	
Rooftop Equipment	See Chapter 30.30 (Site Planning)	N/A	See Chapter 30.30.020 (Site Planning)	N/A
Lighting	See Chapter 3	N/A	See Chapter 30.30.040 (Site Planning)	N/A

Development Feature	Requirement by Zoning District			
	CE	CEM	MS	SR
	0.30 (Site Planning)			
Trash Collection Areas	See Chapter 30.30 (Site Planning)	N/A	See Chapter 30.30.030 (Site Planning)	N/A
Parking and Loading	As required by Chapter 30.32 (Parking and Loading)	N/A	As required by Chapter 30.32 (Parking and Loading)	N/A
Design Review	As required by Chapter 30.47 (Design Review)		As required by Section 30.15.040(F) Development Plan review	

Notes:

(1) For exceptions to height limits for wireless telecommunications facilities, see Chapter 30.48.

(2) For lot coverage, setback, height, and landscaping requirements related to solar energy equipment, see Section 30.30.050.

(3) In the MS zone only, 1 dwelling unit shall comply with R-2250 standards and multiple residential dwelling units shall comply with the R-2250 standards, except for height and stories, which shall be determined by the district.

(4) All parking structures shall be subject to the PS Overlay required setback standards, see Section 30.23.040(A).

E. Regulations in Major Ridgeline Areas, Secondary Ridgeline Areas, and Blue-Line Stream Areas. *All subdivisions, development, building, construction, and grading in the SR Zone shall be regulated by Sections 16.04.030, 16.04.003, and 16.04.037 of this code as related to major ridgeline areas, secondary ridgeline areas, and blue-line stream areas. Any exception to the standards contained in these sections shall only be made by the planning commission/city council at a public hearing.*

F. Development Plan Review. The following regulations shall apply to areas within the SR Special Recreation Zone.

1. The plans for any site development or for any building, construction, expansion, alteration, or for the increase or decrease of any existing area, or area to be acquired and

developed for any permitted private or accessory use shall be submitted for review to the planning commission or to the city council with a recommendation from the planning commission for precise plan of design overlay zone (PPD) applications. Notwithstanding the above, the director of community development shall have the authority to review and approve minor alterations to project sites when, in his or her opinion, there are minimum impacts to surrounding uses and properties. Applications which involve wireless telecommunications facilities shall comply and be designed in accordance with the standards specified in Chapter 30.48 of this code. The director of community development shall set a public hearing before the planning commission. The director of community development or city clerk shall give notice of the public hearing to be held by the planning commission. The notice of the public hearing shall contain the date, time and place of the hearing and a general description of the proposed development and shall follow the requirements of Chapter 30.61, Hearings and Public Notice.

2. Development plans shall be reviewed as to their conformance with the comprehensive general plan, public access and circulation, effect of the design and construction of buildings, facilities, auxiliary uses and general plan of development upon the existing or planned uses and development of the surrounding private or public property, and the recreational objectives and services being offered to the public. For applications involving wireless telecommunications facilities, the planning commission shall also consider specific physical or technical factors which make infeasible the use of or co-location upon a preexisting antenna support structure or preexisting building or structure.

3. Development plans shall be approved, approved subject to conditions or denied by the planning commission. Conditions of approval may include, but shall not be limited to the following areas: setbacks, height, landscaping, access and circulation, parking, architectural design, site design, layout and configuration, hours of operation, security, buffering and screening techniques. The decision of the planning commission may be appealed to the city council pursuant to the provisions of Chapter 2.88 of this code relating to the uniform appeal procedure.

4. For the duration of approved development plans for projects in the SR Special Recreation Zone, see Chapter 30.41.

5. The director of community development shall have the authority to modify approved landscape plans when modifications are consistent with California-friendly plantings or California-friendly landscaping as defined in Section 13.36.040 of this code. (Ord. 5847 § 5, 2015; Ord. 5747 § 17, 2011; Ord. 5692 § 21, 2010; Ord. 5677 § 1, 2009; Ord. 5645 § 16, 2009; Ord. 5453 § 5, 2005: Ord. 5399 Attach. A, 2004)

L94-11 The comment opines that the City of Glendale did not fully evaluate potential noise impacts of the Project. Please refer to Topical Response No. 8 for amplification and clarification of and a supplemental discussion on potential construction noise impacts related to pipeline construction. Section 4.10 of the Draft EIR includes applicable thresholds of significance and comparison of the Project's anticipated noise levels to the thresholds of significance. The construction noise modeling output files were

inadvertently omitted from the Draft EIR's technical appendices. The construction noise modeling output files are included in Appendix J of the Final EIR. The construction noise data included in Table 40 of the Draft EIR is accurate and construction noise impacts would be below applicable thresholds of significance at all receptors modelled. Table 37 and Appendix J of the Final EIR have been accordingly updated.

L94-12 The comment concludes that the Project would result in significant impacts and "community compatibility" issues involving aesthetics, land use, noise, and vibration. The commenter is directed to Topical Responses No. 4, 8 and Draft EIR Section 4.9 for land use analysis, and the other responses to the Commenter's letter. See Responses L94-8, L94-9, and L94-10.

L94-13 to

L90-14 Section 15126.6(d) of the State CEQA Guidelines states that alternatives analysis need not be presented in the same level of detail as the assessment of the proposed Project. Rather, the EIR is required to provide sufficient information to allow for meaningful evaluation, analysis, and comparison with the proposed Project. If an alternative would cause one or more significant impacts in addition to those of the proposed Project, analysis of those impacts is to be discussed, but in less detail than for the proposed Project. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the project objectives, reduce project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Please also refer to Topical Response No. 10.

L94-15 Stationary Source Regulatory Measure CMB-01 is an emissions reduction strategy not a regulatory requirement for consistency with the Air Quality Management Plan. Section 4.2, Air Quality, of the Draft EIR discusses the Project's consistency with the Air Quality Management Plan. Section 5.4.4 of the Draft EIR notes that the use of fuel cells would meet the Project objectives. The LFG would need to be treated to a higher standard for use in fuel cells compared to use in reciprocating internal combustion engines. This additional LFG pre-treatment would require more equipment and a larger LFG treatment area than that needed for the Project.

Table 53 of the Draft EIR presents operational and planned LFG to energy projects in the State of California. As shown in Table 53, of the more than 100 projects, there are no operational and only one planned project that proposes fuel cell technology for LFG. The planned fuel cell project would be located at Coyote Canyon Landfill in Newport Beach and would generate approximately 4 MW of electricity using 2.7 million standard cubic feet of LFG per day. On June 16, 2021, the City of Glendale learned from Orange County Waste and Recycling that the planned fuel cell project at Coyote Canyon has been cancelled. The fuel cell project was cancelled because the technology supplier, Fuel Cell Energy, elected to no longer participate in the planned project because the fuel cell



technology required LFG with a minimum methane content of 48 percent. LFG at Coyote Canyon has approximately 45 percent methane content. Orange County Waste and Recycling is evaluating converting the LFG to RNG which reportedly requires LFG with a minimum methane content of 45 percent, however, Orange County Waste and Recycling is not sure if the 45 percent methane content can be maintained over time to make an RNG project feasible. Orange County Waste and Recycling further reported that the cost of converting LFG to RNG is approximately $9 per million cubic standard feet of LFG (personal communication with Robert Peace, Orange County Waste and Recycling, Renewable Energy Manager).

In consideration of the above information as well as the fact that LFG at Scholl Canyon Landfill only has a methane content of approximately 36 percent, which is well below the applicable 48 percent methane content for the fuel cell technology considered at Coyote Canyon Landfill, a fuel cell alternative was determined not technically or economically feasible at the scale required and therefore was not considered for further analysis. Please also refer to Topical Responses No. 5 and 10. The Project would not have a significant health risk impact.

L94-16 As discussed in Section 4.2, Air Quality, and Section 4 overall of the Draft EIR, the Project does not have any unmitigable air quality, or any other environmental impacts that microturbines or any other alternative would eliminate. Please also refer to Topical Responses No. 5 and 10. Note that Topical Response No. 5 included updated health risk assessment results related to an assumed increase in LFG available at Scholl Canyon Landfill as well as the presence additional compounds including dioxins.

L94-17 The comment notes that the Draft EIR states that a convert LFG to compressed natural gas alternative would have lower operation phase emissions of air pollutants, greenhouse gases, and noise compared to combustion of the LFG in internal combustion engines to generate electricity. The commenter requests that because of this reason, a convert LFG to compressed gas natural alternative should be screened because of the health risks associated with the Project. The Draft EIR states the emissions and noise associated with hundreds of truck fueling trips per day would likely result in comparable operational air pollutant emissions and noise as the proposed Project. Please refer to Topical Response No. 5 which demonstrates the Project would have less than significant health risk impacts, even when considering the potential impacts of an increased volume of available LFG combusted. Considering these facts and because the convert LFG to compressed natural gas alternative would not substantially decrease operation phase emissions, a health risk assessment was not needed for comparison to the Project's potential health risk impacts. Please also refer to Topical Response No. 10. Additionally, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. The additional detailed information requested by the commenter would not change the analysis of Project environmental impacts in the Draft EIR and is not required by CEQA.



L94-18 The analysis of potential air quality, energy, greenhouse gases, hazardous and hazardous materials, and noise impacts of Alternative 4 is sufficient to make reasonable comparisons to the Project's potential and their comparison to the Project's potential air quality, energy, greenhouse gases, hazardous and hazardous materials, and noise impacts. For example, Alternative 4 and the Project would include the same primary sources of air emissions and noise. The conclusion that Alternative 4 would have incrementally greater air quality and noise impacts compared to the Project is based on the fact that the sources of air emissions and noise would operate much closer to sensitive receptors compared to the Project. Alternative 4 would additionally involve more energy use and hazards associated with conveying the LFG through the 6-mile-long LFG pipeline to Grayson that the Project would avoid.

L94-19 The Commenter expresses an opinion or preference concerning which alternative they would prefer and claims the Draft EIR did not adequately demonstrate that several of the alternatives not selected for further analysis fail to meet most of the basic Project Objectives. Please also refer to Topical Response No. 10 and Response L94-15.

L94-20 Please refer to Topical Response No. 8.

L94-21 Please refer to Topical Response No. 8.

L94-22 Please refer to Topical Response No. 8.

L94-23 The Project objectives were refined between the preparation of the Final MND and Draft EIR. The City has elected to utilize a single and critical Project objective which led to the evaluation of more alternatives to the Project that would either meet or partially meet the Project objective. The commenter notes that this single Project objective leads to a conclusion that only the proposed Project would meet the Project objective and narrows further study of alternatives. Section 5 of the Draft EIR correctly concludes that Alternatives 2, 3, and 4 would meet the Project objective. Of the four alternatives evaluated, only Alternative 1 (No Project) was shown not to meet the Project objective. Please also refer to Topical Response No. 10.

L94-24 The LFG pipeline would be purged of LFG as part of abandonment. The LFG would be displaced from the LFG pipeline by either pushing the gas from Grayson Power Plant to Scholl Canyon Landfill or by applying a vacuum to the pipeline from Scholl Canyon Landfill. The purged LFG would be collected at Scholl Canyon Landfill and combusted in the flares to avoid venting of the LFG to the atmosphere which would have greater GHG and odor impacts. The Draft EIR has been updated to reference the applicability of SCAQMD Rule 1149 which the City will adhere to during pipeline decommissioning.

L94-25 The commenter notes that the area disturbance estimates for the Project exceed the estimate used to quantify grading emissions. The area of Project disturbance includes all areas where construction would occur and includes graded areas as well as areas that would be disturbed from non-grading related activities. For example, the water and



natural gas pipelines will be primarily installed above ground except for road crossing and is not expected to require grading for installation. The area proposed to be graded is the power generation facility and water tank area comprising 2.07 acres as listed in Table 1 of the Draft EIR. The 3 acres used to estimate grading construction emissions is therefore overestimated and conservative for purposes of evaluating the potential air quality impacts of grading for the Project.

L94-26 Pursuant to SCAQMD Rule 1110.2, the engines are required to meet the NO_X emission levels of 11 ppmv @ 15 percent O_2. Additionally, the engines are required to have continuous emission monitoring system (CEMS) to ensure the engines comply with the emission limits during normal operation. Similar to NO_x, the engines are required to have CEMS for CO as well.

L94-27 The NO_X, CO, and VOC values initially presented in Table 12 reflected 30-day average emissions instead of maximum daily emissions. However, the offset allocations from SCAQMD priority reserve will reduce the net emission increase of these pollutants below the significance thresholds. Nonetheless, air dispersion modeling was performed to analyze the ambient air quality impact of the Project. As described in Appendix B.3.1, the model was based on the highest emissions scenario in 1-hour, 8-hour, 24-hour average, and annual average period time.

L94-28 The AERMOD output presented in Table 18 is based upon emissions calculated for the worst-case scenarios as described in Table 2 of Appendix B.3.1. For example, NO_X emissions in one-hour average period were calculated using controlled NO_X emission of 11 ppmv, uncontrolled emission of 23.50 lbs per startup and uncontrolled emissions of 7.40 lbs per shutdown.

L94-29 The manufacturer specification for maximum heat input rating of 23.9 mmbtu/hr is based on lower heating value. The emission inventory used 26.34 mmbtu/hr as the maximum heat input rating based on higher heating values as indicated in the equipment specification provided in Appendix B.2.3.

L94-30 Section 3.2 of the Draft EIR includes a discussion on related and cumulative projects, including extensive due diligence and correspondence with other adjoining municipalities and utility companies to identify and screen potential cumulative projects for consideration. Air quality by its very nature is a cumulative issue for the entire region. However, the Draft EIR demonstrates that Project's contribution to regional air quality and combatively would be less than significant because the Project's emissions are below the applicable mass emissions thresholds after incorporation of regulatory required offsets. The Project's analysis of potential cumulative air quality impacts had been augmented in the Final EIR to further demonstrate the Project would not result in a significant air quality impact in consideration of its proximity to Lower Scholl Canyon Park and a future recreation land use after landfill closure. The comment is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.



L94-31 The GHG emissions presented in Appendix F of the Draft are based on available LFG production estimates at the time the Draft EIR was prepared. The GHG analysis in the Final EIR is based on updated LFG production data. Please refer to Topical Response No. 5 for the updated GHG analysis.

L94-32 Please refer to Response L94-31.

L94-33 Please refer to Topical Response No. 7.

L94-34 Please refer to Topical Response No. 9.

L94-35 LASAN is on the City of Glendale's list of interested parties to receive CEQA notices on the Project.

L95 - Responses to Comments from Los Angeles City Council District 14, received September 25, 2020

L95-1 The comment is a general introductory statement and invites staff to call a provided number if there are any questions or concerns about the submitted comments. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. If there are any questions regarding the submitted comments the provided phone number will be contacted.

L95-2 The comment starts with a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Commenter's statement that the Project and the Grayson Repowering Project are related project is addressed in Topical Response No. 2. In addition, an EIR's evaluation of cumulative impacts may be based on a list of past, present, and probable future projects producing related impacts, including, if necessary, projects outside the lead agency's control. 14 Cal Code Regs §15130(b)(1)(A). The basic standard for compiling such a list is that projects should be included when it is reasonable, feasible, and practical to do so, given the information available about the projects, and when failure to include such projects would lead to an inadequate analysis of the severity and significance of the cumulative impacts in question. Grayson Repowering Project is a "related project" under CEQA for purposes of the required cumulative impacts analysis.

L95-3 The comment notes disappointment that a public scoping meeting was not held in the community of Eagle Rock. The City of Glendale as Lead Agency did conduct public scoping meetings in the City of Glendale and fulfilled CEQA requirements for conducting such meetings. Any member of the public, regardless of home address was welcome to

participate in the public scoping meetings. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L95-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L95-5 The comment is a general statement about the commenter's opinion of (or preference about) the Project and voices disappoint from a perception that the City of Glendale is not addressing Eagle Rock concerns. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA; all required public noticing was completed and the public was provided with ample opportunities to comment. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L95-6 Alternative 2 which is described and evaluated in Section 5 of the Draft EIR evaluates cleaning the LFG, converting it to natural gas, and conveying the natural gas into a SoCal Gas company natural gas pipeline. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L95-7 Alternative 4 which is described and evaluated in Section 5 of the Draft EIR evaluates relocating the proposed internal combustion engine generators at Grayson Power Plant. The LFG compression and cleanup system would be located at Scholl Canyon Landfill. The cleaned LFG would be transported from Scholl Canyon Landfill to Grayson Power Plant through the existing LFG pipeline. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L95-8 Please refer to Topical Response No. 1. The Draft and Final EIRs demonstrate that potentially significant environmental impacts have been mitigated to less than significant levels.

L95-9 The comment is a general statement about the commenter's opinion of (or preference about) the Project and voices disappointment from a perception that the City of Glendale is not addressing City of Los Angeles concerns. Glendale held multiple meetings on the prior MND (not adopted) for this Project and responded to Eagle Rock's comments on the MND. For the Project's Draft EIR which is the same project previously evaluated in the MND and on which Eagle Rock extensively commented - Glendale conducted additional meetings and this Response to Comments responds to Eagle Rock's comment letters. The comment does not identify a specific environmental analysis or CEQA issue relative

to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L95-10 The comment expresses support of all comments within comment letter L94, submitted by LASAN on September 25, 2020. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L95-11 The comment is a request for the City of Glendale to conduct public meetings in Eagle Rock. Please refer to L95-4. Glendale is the Lead Agency, and the proposed Project is located within Glendale. CEQA does not require Glendale to conduct public meetings in every jurisdiction that requests meetings. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L95-12 Please refer to individual environmental impact analyses within Section 4.0 of the Draft EIR for analyses of cumulative impacts. Please refer to Section 5.6.6 of the Draft EIR for a discussion of the environmentally superior alternative. Please also refer to Topical Response No. 10.

L95-13 The comment is a general statement about the commenter's opinion of the environmental impact analysis (or preference about) the Project and does not identify any inadequacies in the Draft EIR. All required notices for the Draft EIR and prior MND for the same project, were provided. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L96 - Responses to Comments from David Eder, received September 25, 2020

L96-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L96-2 Please refer to Topical Response No. 9.

L96-3 Please refer to Topical Responses No. 2 and 7.

L96-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's

statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 9.

L97 - Responses to Comments from Hassan Rad, received September 25, 2020

L97-1 This is an email thanking Paul Cobian for his submission of the Los Angeles Sanitation and Environment comment letter on behalf of the City of Los Angeles. The Los Angeles Sanitation and Environment comment letter was received in a separate email on September 25, 2020. Please see responses to comments of L94 from Los Angeles Sanitation and Environment, received September 25, 2020.

L98 - Responses to Comments from Individual, received September 25, 2020

L98-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L99 - Responses to Comments from Kim Turner, received September 25, 2020

L99-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response Nos. 1 and 5.

L100 - Responses to Comments from Lynn Woods, received September 25, 2020

L100-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L100-2 Please refer to Topical Response No. 9.

L100-3 Please refer to Topical Responses No. 1, 5, and 7.

L100-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L100-5 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L100-6 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L101 - Responses to Comments from Mary Fischer, received September 25, 2020

L101-1 Please refer to Topical Response No. 1.

L101-2 Please refer to Topical Responses No. 5, 7, 8, and 9.

L101-3 Please Refer to Topical Response No. 2.

L101-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L102 - Responses to Comments from Melissa Estrada, received September 25, 2020

L102-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L102-2 Please refer to Topical Response No. 9.

L102-3 Please refer to Topical Response No. 5.

L102-4 Please refer to Topical Response No. 6.

L102-5 Please refer to Topical Response No. 2.

L102-6 Please refer to Topical Response No. 1.

L102-7 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's

statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L103 - Responses to Comments from Susan Leising, received September 25, 2020

L103 The comments within this letter directly reiterate comments previously submitted by Marwan and Amy Ataya on September 6, 2020. Please refer to responses to comments of L40 from Marwan and Amy Ataya, received September 6, 2020.

L104 - Responses to Comments from Claudia Puig, received September 26, 2020

L104 All comments within this letter (L104-1 through L104-7) directly reiterate comments previously submitted by the Coalition for Scholl Landfill Alternatives (CSLA) on September 23, 2020. Please refer to responses to comments of L84 from CSLA, received September 23, 2020.

L105 - Responses to Comments from Madeline Wills, received September 26, 2020

L105-1 Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significant cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Responses No. 5, 6, 7, and 9.

L106 - Responses to Comments from Cyndi Otteson, received September 27, 2020

L106-1 Please refer to Topical Responses No. 1 and 5.

L106-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 9.

L107 - Responses to Comments from Deirdre Wills, received September 27, 2020

L107-1 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. However, the Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than continuing to flare the LFG and lose the energy created from the required combustion, the proposed Project seeks to capture that same LFG and beneficially use it to generate power to assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in

operation. Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significant cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Responses No. 5, 7, and 9.

L108 - Responses to Comments from Myanna Dellinger, received September 27, 2020

L108-1 The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L108-2 Please refer to Topical Response No. 9.

L108-3 Please refer to Topical Response No. 2.

L108-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L108-5 The comment states the deadline for the public comment period for the Draft EIR. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L109 - Responses to Comments from Allan Herbert, received September 28, 2020

L109-1 The comment is a general statement expressing the commenter's support of the Project. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110 - Responses to Comments from Glenoaks Canyon Homeowners Association (GOCHA), received September 28, 2020

L110-1 This comment was submitted by Marie Freeman on behalf of the Glenoaks Canyon Homeowners Association (GOCHA) and introducing attached comment letters from GOCHA and Soil Water Air Protection Enterprise (SWAPE).

L110-2 The comment introduces GOCHA and identifies GOCHA's relationship to Glendale. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-3 CEQA requires the Draft EIR to assess impacts of the proposed Project. Therefore, the Project has no past or current impacts because it did not previously exist and does not currently exist. CEQA Guidelines section 15002 (a) identifies the basic purpose of CEQA is to "(1) Inform governmental decision makers and the public about the potential significant environmental impacts of proposed activities." The analysis of environmental impacts of the proposed Project, is set forth in Section 4.0 of the Draft EIR. The analysis of related projects and cumulative impacts are set forth in Sections 3.2 and 4.0 of the Draft EIR.

The City as Lead Agency takes responses to public comments seriously. CEQA jurisprudence, as summarized in the Continuing Education of the Bar (CEB) Treatise "Practice Under the California Environmental Quality Act", Kostka Zischke, March 2021, ("CEB Treatise"), section 6.42, makes clear that public comments not based on a specific factual foundation do not constitute substantial evidence. Pub Res C §21082.2(c). "Opinions expressed by members of the public do not qualify as substantial evidence if they are not based on personal observation or experience. *Gentry v City of Murrieta* (1995) 36 CA4th 1359, 1417 (residents' opinions that road widening would prevent continued recreational use and have other impacts was not substantial evidence because there was no specific factual foundation for the claims); *Newberry Springs Water Ass'n v County of San Bernardino* (1984) 150 CA3d 740 (neighbors' concerns about odors and flies from dairy were not substantial evidence, because no specific evidence was given about flies or odors at other dairies or the project).

"Complaints, fears, and suspicions about a project's potential environmental impact likewise do not constitute substantial evidence. See *Joshua Tree Downtown Bus. Alliance v County of San Bernardino,* 1 CA5th at 690 (citing this book); *Taxpayers for Accountable Sch. Bond Spending v San Diego Unified Sch. Dist.*, 215 CA4th at 1042 (general objection to noise in neighborhood not substantial evidence); *Porterville Citizens for Responsible Hillside Dev. v City of Porterville,* 157 CA4th at 905 (general objections to project density and quality were not substantial evidence of environmental impact); *Bowman v City of Berkeley* (2004) 122 CA4th 572, 588 (generalized aesthetic objections to project without regard to surrounding context of urbanized development were not substantial evidence); *San Joaquin Raptor/Wildlife Rescue Ctr. v County of Stanislaus* (1996) 42 CA4th 608 (conclusory statement about cumulative impact was not substantial evidence); *Lucas Valley Homeowners Ass'n v County of Marin* (1991) 233 CA3d 130 (expressions of generalized concerns and fears about traffic and parking impacts, and anecdotal statements about parking problems at another facility, are not substantial evidence); *Leonoff v Monterey County Bd. of Supervisors* (1990) 222 CA3d 1337 (opponents' subjective concerns and unsubstantiated opinions about dangerous traffic conditions are not substantial evidence); *Perley v Board of Supervisors* (1982) 137 CA3d 424 (neighbors' unsubstantiated fears and concerns about project's impacts lacked objective basis for challenge and did not constitute substantial evidence).

"Speculation about a project's impacts also has no evidentiary value. *Friends of Riverside's Hills v City of Riverside* (2018) 26 CA5th 1137, 1152 (speculation that final plans for development might not comply with city standards for protection of hillsides was insufficient to show significant environmental impact might occur); Keep Our Mountains Quiet v County of Santa Clara, *236 CA4th at 734* (claimed noise impacts on trails that might be established in future held to be speculative); *Friends of Davis v City of Davis* (2000) 83 CA4th 1004, 1020 (assumption of competitive impact from retail tenant speculative); *Pala Band of Mission Indians v County of San Diego* (1998) 68 CA4th 556, 580 (comment letter submitted by counsel for opponents consisting almost exclusively of "mere argument and opinion" did not constitute substantial evidence); *Citizen Action to Serve All Students v Thornley* (1990) 222 CA3d 748 (speculation and generalizations about traffic, parking, economic effects, and earthquake safety did not constitute substantial evidence); *Snyder v City of S. Pasadena* (1975) 53 CA3d 1051, 1060 n4 (public comment that unforeseen factors may lead to traffic impacts of street closing plan properly disregarded as speculation)."

L110-4 The 2.2-acre area referenced in the comment only includes the location of the proposed Project. The Project also includes areas of development related to the installation of the proposed water and natural gas pipelines as well as vegetation disturbances to meet code requirements for fire protection. The Draft EIR evaluates impacts of the Project beyond the 2.2 acres where environmental impact from the proposed Project may occur. For example, the Draft EIR evaluates short-term construction and long-term operation noise impacts to the nearest residential and recreation receptors. The areas evaluated for potential impacts in the Draft EIR vary based on the environmental resource category considered (i.e., air quality, aesthetics, biological resources, noise, transportation and circulation) due to differences in environmental setting, regulatory framework, or potential for the Project to impact that specific resource category. Please refer to Sections 3.0 and 4.1 through 4.14 of the Draft EIR for a description of the environmental setting, regulatory framework, methodology, and analysis of the Project's potential environmental impacts. Please also refer to Topical Response No. 2.

L110-5 Please refer to Topical Responses No. 1, 3, 4, and 5.

L110-6 Please refer to Topical Response No. 2.

L110-7 Please refer to Topical Response No. 2.

L110-8 The commenter states "The descriptions and justifications in the Draft EIR often lack specificity or accuracy so reliable conclusions cannot be drawn about whether an impact is significant or not." The comment is a generalized statement and does not identify a specific description or justification used in the Draft EIR that is inaccurate or lacks specificity. See also Response L110-3. L110-9 Please refer to Topical Response No. 5.

L110-10 The commenter states “Insufficient or unreliable information is presented, so it is difficult to draw valid conclusions or make valid comparisons among alternatives and the Project.” The comment is a generalized statement and does not identify specific information in the Draft EIR that the commenter believes are insufficient or unreliable. The commenter’s statement is included in the Final EIR for the decision-maker’s consideration as part of the City’s deliberations on the Project. Please also refer to Topical Response No. 10.

L110-11 CEQA Guidelines Section 15126.6(a) states that “an EIR shall describe a range of reasonable alternatives to the project or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.”

Potential environmental impacts of the alternative and the proposed Project are compared for each environmental topic area. Where, based on objective criteria, the impact of the alternative would be clearly less than the impact of the proposed Project, the comparative impact is said to be “less.” Where the alternative’s net impact would clearly be more than the proposed Project, the comparative impact is said to be “greater.” Where the impacts of the alternative and Project would be roughly equivalent, the comparative impact is said to be “similar” (Section 5.5 of the Draft EIR). For additional information on the analysis format please refer to Section 5.5 of the Draft EIR. Section 15126.6(d) of the State CEQA Guidelines states that alternatives analysis need not be presented in the same level of detail as the assessment of the proposed Project. Rather, the EIR is required to provide sufficient information to allow for meaningful evaluation, analysis, and comparison with the proposed Project. If an alternative would cause one or more significant impacts in addition to those of the proposed Project, analysis of those impacts is to be discussed, but in less detail than for the proposed Project. Please also refer to Topical Response No. 10.

L110-12 The comment expresses an opinion that Alternative 2, converting LFG to natural gas is the most protective of the environment and surrounding community compared to the Project. The Comment makes reference to a letter attached to the GOCHA comment letter that alleges the Alternatives analysis is inadequate. That letter is addressed separately. Please also refer to Topical Responses No. 5 and 10.

L110-13 CEQA Guidelines Section 15126.6(a) states that “an EIR shall describe a range of reasonable alternatives to the project or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.” The Lead Agency need not select every conceivable alternative, even ones selected by commenters. Los Angeles County Sanitation District routinely analyzes the methane content and concentrations of various potential constituents of concern in the LFG collected from the Scholl Canyon Landfill. Los Angeles County Sanitation District

LFG testing has not included analyzing for the presence of dioxins. City of Glendale analyzed the exhaust of a Scholl Canyon Landfill LFG-fueled boiler at Grayson Power Plant in November 2018 for the presence of dioxins, which were detected at low concentrations. The Project's gas treatment system and selective catalytic reduction for emissions control would be effective in removing dioxins, if present, in the LFG prior to release into the air through the reciprocating internal combustion engine generator exhaust stream. However, it has been conservatively assumed for purposes of the Project's health risk assessment that the same dioxin concentrations detected in the LFG-fueled boiler exhaust at Grayson Power Plant could be present in the flare exhaust at Scholl Canyon Landfill. As such, the City of Glendale has updated the Project's health risk assessment to consider the flares as a source of dioxin emissions. The results of the updated health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Final EIR, air emissions from the proposed Project will not expose the nearest sensitive receptors to significant cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Responses No. 5 and 10.

L110-14 Please refer to Topical Responses No. 1, 4, 5, 6, 7, 8, and 9.

L110-15 The alternatives selected for analysis represent a reasonable range that could potentially feasibly meet or partially meet the Project objectives, reduce project impacts is some areas, and which are either currently being used to manage LFG in existing landfills elsewhere, or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Section 15126.6(d) of the State CEQA Guidelines states that alternatives analysis need not be presented in the same level of detail as the assessment of the proposed Project. Rather, the EIR is required to provide sufficient information to allow for meaningful evaluation, analysis, and comparison of the reasonable range of alternatives with the proposed Project. The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes. The Draft EIR demonstrates through applying the applicable thresholds of significance that the Project's potential environmental impacts would be less than significant with mitigation. Please also refer to Topical Responses No. 2 and 10.

L110-16 The comment introduces an outline of highlights of the Scholl Canyon Landfill Work Group's comments and questions. The statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-17 Please refer to Topical Response No. 4.

L110-18 The Project is required by SCAQMD's New Source Review Rule 1303 regulations to implement Best Available Control Technology as a condition of air permit issuance. Emissions reduction credits are required by regulation and SCAQMD cannot issue an air permit for the Project without verification that the permittee has obtained and surrendered



the required offsets for the new emissions sources. Additionally, Section 4.2 of the Draft EIR and Topical Response No. 5 further demonstrate that potential air quality impacts of the Project would be less than significant.

L110-19 Please refer to Section 4.3.4 of the Final EIR for an analysis of Project impacts including wildlife movement and migratory corridors as well as sensitive species. This section includes updates made to the biological resources impact analysis and mitigation measures based on consideration of California Department of Fish and Wildlife comments received on the Draft EIR. Please refer to Response to L117 below.

L110-20 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the Project objectives, reduce Project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Please also refer to Topical Responses No. 10.

L110-21 Please refer to Topical Responses No. 6 and 9.

L110-22 The commenter states that the baseline emissions from the existing flares should be added to the Project greenhouse gas emissions then compared to the mass emissions threshold of significance. Every standard cubic foot of LFG recovered would be combusted in either the reciprocating internal combustion engines, regeneration flare, or existing flares. The same standard cubic foot of LFG cannot be combusted simultaneously in more than one combustion source. When the Project's reciprocating internal combustion engines are operating, they would combust LFG that would have been otherwise combusted in the existing flares. As a result, the Project's greenhouse gas emissions are primarily based on the total volume of LFG combusted, so, adding the baseline flare emissions to the emissions from combusting LFG in the reciprocating internal combustion engines is double-counting emissions, and that is inconsistent with CEQA's consideration of baseline impacts and would inappropriately elevate baseline. Please also refer to Topical Response No. 5.

L110-23 Please refer to Topical Responses No. 7 and 9.

L110-24 Please refer to Topical Response No. 7.

L110-25 Please refer to Topical Response No. 1 and Responses L94-10 and L94-12.

L110-26 Please refer to Topical Response No. 8.

L110-27 Please refer to Topical Response No. 8.

L110-28 Please refer to Topical Responses No. 6 and 7. The natural gas pipeline is discussed in each environmental resource category in Section 4 of the Draft EIR.

L110-29 Please refer to Topical Response No. 9.

L110-30 The comment expresses support of Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 10.

L110-A-1 Please refer to Topical Response No. 4.

L110-A-2 Please refer to Topical Response No. 4 and Responses L94-10 and L94-12.

L110-A-3 Please refer to Topical Response No. 1. The Lead Agency has to evaluate the impact of the proposed Project. A future project for which there are no details susceptible to accurate stable description; such an analysis would require speculation. Speculation about a project's impacts has no evidentiary value. *Friends of Riverside's Hills v City of Riverside* (2018) 26 CA5th 1137, 1152 (speculation that final plans for development might not comply with city standards for protection of hillsides was insufficient to show significant environmental impact might occur); *Keep Our Mountains Quiet v County of Santa Clara*, 236 CA4th at 734 (claimed noise impacts on trails that might be established in future held to be speculative); *Pala Band of Mission Indians v County of San Diego* (1998) 68 CA4th 556, 580 (comment letter submitted by counsel for opponents consisting almost exclusively of "mere argument and opinion" did not constitute substantial evidence).

L110-A-4 The line of site analysis consists of photography taken from various reasonable vantage points. Please refer to https://www.glendaleca.gov/Home/ShowDocument?id=57957 that contains a digital version of the line of site analysis figures. CEQA does not require that an agency conduct every recommended test and perform all recommended research in evaluating a project's environmental impacts (14 Cal Code Regs §15204(a)); See also, *Bay Area Citizens v Association of Bay Area Gov'ts* (2016) 248 CA4th 966, 1017; *Society for Cal. Archaeology v County of Butte* (1977) 65 CA3d 832. See also *Association of Irritated Residents v County of Madera* (2003) 107 CA4th 1383, 1396; *Cadiz Land Co. v Rail Cycle* (2000) 83 CA4th 74, 102; *Riverwatch v County of San Diego* (1999) 76 CA4th 1428, 1447.

L110-A-5 Please refer to Topical Responses No. 1 and 4. CEQA does not require the Lead Agency to speculate about future impacts or whether future changes in regulatory frameworks may occur. See Response L110-A-3 above.

L110-A-6 Please refer to Topical Response No. 5.

L110-A-7 Please refer to Topical Response No. 5.

L110-A-8 Please refer to Topical Response No. 5.

L110-A-9 Please refer to Topical Response No. 5.

L110-A-10 Please refer to Topical Response No. 5.

L110-A-11 Please refer to Topical Response No. 5.

L110-A-12 Please refer to Topical Response No. 5.

L110-A-13 Please refer to Topical Response No. 5.

L110-A-14 Please refer to Topical Response No. 5.

L110-A-15 Please refer to Topical Response No. 5.

L110-A-16 The commenter states that they feel impacts to biological impacts are under-reported, that key species are missing from the assessment, and that the hills serve as a wildlife corridor which could be disrupted by the Project. As stated in in section 4.3.3 of the Draft EIR the analysis presented in Section 4.3.4 below examines the potential impacts to plant and wildlife resources that may occur as a result of implementation of the proposed Project, including both direct and indirect impacts.

The analysis presented in the Draft EIR included field evaluations, which involved reconnaissance-level surveys, habitat assessments, and focused rare plant surveys, as well as a literature review to determine special-status plants, wildlife, and vegetation communities that have been documented within the vicinity of the proposed Project. This information was used to determine a list of sensitive plants and wildlife to be analyzed as part of the impact analysis presented in Section 4.3.4 of the Draft EIR.

As described in Section 4.3.1.4 of the Draft EIR the proposed Project site generally lacks the cover, presence of refugia, or other characteristics conducive the permanent use of and/or movement through a habitat by many native wildlife species. The analysis presented in Section 4.3.4 of the Draft EIR found that construction activities may temporarily limit terrestrial wildlife movement within the proposed Project area; however, the broad geographic range and habitat that occurs in the region would remain available to wildlife.

L110-A-17 The commenter states the Surrounding Uses section does not include the baseball field and golf course built on reclaimed landfill nor the parks and daycare facility located in Eagle Rock. Although Section 3.1.2 of the Draft EIR does not specifically mention the baseball field and golf course that occupy closed areas of the landfill by name, it does refer to the very low density/open space land uses, in which the golf course and baseball field are included. Additionally, Section 3.1.2 of the Draft EIR does state that the community of Eagle Rock occurs immediately south of the proposed Project site but does not specify the location of a day care facility. Where applicable specific issue areas discuss surrounding land uses in more detail. For example, Section 4.3.1.4, in regard to wildlife corridors, states that the BSA is characterized primarily by open space; however much of that land is occupied by the Scholl Canyon Landfill and recreational facilities

(baseball field and golf course). Please also refer to Topical Responses No. 5 and 8 that discuss potential air quality and noise impacts to adjacent existing and future recreation land uses.

L110-A-18 The commenter states that biological data was collected on one day per calendar quarter and does not accurately represent the breadth of plant and animal diversity. As stated in Section 4.3.1.1 of the Draft EIR biologists conducted several surveys over various time periods, within the BSA to evaluate potential Project impacts on biological resources. Field evaluations were conducted on nine separate occasions on October 21, 2015, November 3, 2015, January 15, 2016, and July 11, 2017, April 29, 2019 with focused rare plant surveys occurring on January 15, April 15, and September 8, 2016. The results of these surveys were presented in a BRTR prepared by Stantec, dated July 20, 2017. An additional biological field survey was conducted on April 29, 2019 with the results reported in an updated BRTR included as Appendix C of the Draft EIR. The surveys conducted provided the required level of informational baseline to determine the potential for occurrence of special-status species known to occur in the area because the field conditions in the vicinity of the proposed Project have not changed in any ways that could be reasonably expected to modify the results, e.g., addition of new habitat areas. Based in the information gathered in the field and the fact that the field conditions have not changed in any meaningful way that would change the results, no further surveys were required. The EIR additionally includes mitigation measures (BIO-4, BIO-5, BIO-6, and BIO-7) that require additional pre-construction biological clearance surveys. Please also refer to Responses L117-5, L117-10, L117-11, and L117-13.

L110-A-19 The commenter states that the Habitat Assessment and Biological Surveys were incomplete with data collected on very few days and not at night when nocturnal animals (bats, owls, bears, mountain lions, etc.) are most active. All but one sensitive bat species have a low potential for occurrence or were not likely to occur. As stated in Section 4.3.1.3 of the Draft EIR, although bats were not detected in the BSA, they likely forage and roost in the riparian corridors in the region where insect abundance is high. Because this type of foraging habitat does not occur in the BSA, it is unlikely that bats permanently inhabit or forage in significant numbers within the BSA. During surveys within the larger BSA sign of larger mammals such as mountain lion and bear were not observed that warranted additional nocturnal survey work and other than speculation, the Commenter has not presented any substantial evidence that would compel the need to conduct any further surveys. Please also refer to Response L117.

L110-A-20 The commenter states that noticeably absent from the list of birds was the huge flock of seagulls that are normally present at the landfill and that many species of raptors are also missing. The species list presented in the Section 4.3 of the DRAFT EIR and supporting documents for the proposed Project detailed the species observed during various survey events. It is possible that species such as “sea gulls” or other raptor species, other than those identified in project documents, occur within the general area (“sea gulls” is a common name, for the California Gull and other western gulls are not a California



Species of Special Concern, not federally or state protected, or listed anywhere as a sensitive specifies, and whether or not gulls are if present at the Project site would not have changed the analysis presented in the Draft EIR. Please also refer to Response L117.

L110-A-21 The commenter states that only four mammals are listed: ground squirrels, cottontail rabbits, opossums, and raccoons. Residents have often seen "top tier" mammals as well: bobcats, mountain lions, bears, coyote, and foxes. The survey did not detect bats, but residents see then almost nightly. All but one sensitive bat species had a low potential for occurrence or were not likely to occur. As stated in Section 4.3.1.3 of the Draft EIR, although bats were not detected in the BSA, they likely forage and roost in the riparian corridors in the region where insect abundance is high. Because this type of foraging habitat does not occur in the BSA, it is unlikely that bats permanently inhabit or forage in significant numbers within the BSA. During surveys within the larger BSA sign of larger mammals such as mountain lion and bear were not observed that warranted additional nocturnal survey work. The list of common mammals that have the potential to occur, as presented in Section 4.3.1.3 is not an exhaustive list of all common mammals with the potential to occur. Please also refer to IResponse L117.

L110-A-22 The commenter states California gnatcatchers are present in the area. They did not disappear 20 years ago as the report states. The commenter provides no evidence if their presence. Eagles and turkey buzzards come to the area to dine on carrion. As stated in Table 24 of the Draft EIR Limited marginal habitat or coastal California gnatcatcher occurs within the BSA. The nearest recorded occurrence is approximately 8.0 miles to the east of the BSA; however, this observation was over 20 years ago. The most recent record is from 2005, approximately 10.0 miles to the southeast. During surveys within the BSA no evidence of carrion was observed nor were eagles and turkey vultures observed feeding on carrion. Please also refer to Response L117.

L110-A-23 The commenter states that American peregrine falcon are present and hunt over the Project area. They are not 10 miles away and absent for 20 years as the report suggests. As stated in Table 24 of the Draft EIR marginal habitat for this species occurs within the BSA. The nearest and most recent recorded occurrence, based on available database information, is from within the BSA; however, this species has not been credibly observed within 10 miles of the BSA within the last 20 years. This species was not observed during numerous surveys within the BSA. Please also refer to Response L117.

L110-A-24 The commenter states that a variety of bats have roosts in the areas adjacent to the BSA and forage for food over the BSA. All but one sensitive bat species had a low potential for occurrence or were not likely to occur. As stated in Section 4.3.1.3 of the Draft EIR, although bats were not detected in the BSA, they likely forage and roost in the riparian corridors in the region where insect abundance is high. Because this type of foraging habitat does not occur in the BSA, it is unlikely that bats permanently inhabit or forage in significant numbers within the BSA. Please also refer to Response L117.



L110-A-25 The commenter states that the forest rangers in the area describe the BSA as part of the wildlife corridor that links the Santa Monica Mountains and the San Gabriel Mountains which function as an “island” of native habitat between heavily developed areas. Top tier predators are essential to maintaining the natural balance of wildlife in the area, and further industrialization would repel them.

As described in Section 4.3.1.4 of the Draft EIR The BSA is situated in the San Rafael Hills, which functions as an “island” in which patches of native habitat occur surrounded by the heavily developed City of Glendale and the greater Los Angeles area. This relatively small expanse of native habitat and isolation from wider areas of open space would significantly constrain the movement of certain types of wildlife, particularly megafauna, within the San Rafael Hills and by extension, within the BSA. The proposed Project site is predominantly located in an already disturbed area, generally lacks the cover, presence of refugia, or other characteristics conducive the permanent use of and/or movement through a habitat by many native wildlife species. The analysis presented in Section 4.3.4 of the Draft EIR found that construction activities may temporarily limit terrestrial wildlife movement within the proposed Project area; however, the broad geographic range and habitat that occurs in the region would remain available to wildlife. Please also refer to Response L117.

L110-A-26 The commenter states that “the proposed gas processing equipment and power plant do not ensure protection of the ridgelines, canyons, and streams. Table 25 indicates that plant diversity would be reduced due to the bioacoustics on the proposed Project, and noise would have an adverse effect on animal activity as well. Birds use song to attract mates, and bats use echolocation to find food. Noise would greatly reduce the presence of animals that spread seeds, including deer and other animals that range over the area, leaving scat which reseeds and fertilizes plants.”

The proposed Project will not significantly impact any ridgelines or canyons and has been designed such that all gas and water pipelines would be installed overhead above or below all potentially jurisdictional aquatic features. Only minor impacts to a small section of ridgeline adjacent to existing disturbed lands would occur as a result of ac water tank installation.

More than half of the impacts to vegetation communities and land cover types, as presented in Table 25 of the Draft EIR, are to non-native habitats. Mitigation Measure BIO-7 in the Draft EIR and Mitigation Measure BIO-8 in the Final EIR requires that all impacted plant communities and sensitive habitats be restored/replaced.

As detailed in Section 4.10 of the Draft EIR there will only be a minor increase in ambient noise, on a temporary basis, during construction of the proposed Project. Operation of the Project would result in a very small increase in ambient noise depending on the location of a sensitive receptor. Mitigation Measure BIO-5 requires pre-construction surveys for nesting and breeding birds and the implementation of avoidance measures

which will provide for no activity buffers, during the nesting season, should nesting birds be present within 300 feet of the proposed Project. Please also refer to Topical Response No. 8 and Response L117.

L110-A-27 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. Operation of the proposed Project is not expected to require additional on-site personnel. beyond which currently occur. Please also refer to Topical Response No. 10.

L110-A-28 Please refer to Topical Responses No. 6 and 9.

L110-A-29 Please refer to Section 4.5 of the Draft EIR for analyses concerning geology and soils. Please also refer to Topical Response No. 6.

L110-A-30 The comment asserts conclusions regarding seismic waves without providing evidentiary support. Please refer to Topical Responses No. 6, 7, and 9.

L110-A-31 Please refer to Response L-110-22 and Topical Response No. 5.

L110-A-32 The commenter summarizes the differences in greenhouse gas emissions between the existing flares and the proposed Project. The statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 5.

L110-A-33 Please refer to Topical Response No. 5 for updated greenhouse gas emissions estimates which demonstrate that the proposed Project's potential impacts would be less than significant.

L110-A-34 Please refer to Topical Response No. 5 which includes a discussion on the potential air quality impacts of combusting the maximum volume of LFG expected to be presently available or reasonably foreseeable to be available at Scholl Canyon Landfill during the expected life of the proposed Project.

L110-A-35 Please refer to Responses No. L110-A-33 and L110-A-34

L110-A-36 Please refer to Topical Response No. 5.

L110-A-37 Please refer to Topical Responses No. 6, 7, and 9.

L110-A-38 The commenter states that there are elderly care facilities and childcare centers closer than the five to eight miles referenced in Section 4.7.1.3 of the Draft EIR. The Draft EIR analyzes potential impact from hazards and hazardous materials to both the environment and nearby human receptors regardless of the type of facility, as such the reference to the City of Glendale hospital/medial facilities and elderly care facilities being located eight

to five miles from the Project site was removed from the Final EIR. The analysis is for all facilities being located less than five to 8 miles from the Project Site and the age group serviced and the type of service rendered by the facilities does not change any of the environmental impact determinations in the Draft EIR. Section 4.7 of the Draft EIR analyzes potential impacts from hazards and hazardous materials to both the environmental and nearby human receptors. The presence of elderly care facilities and childcare centers being located less than five to eight miles from the Project site does not change any of the environmental impact determinations in the Draft EIR. The statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-39 The comment is a general statement concerning watered plants' tendency to burn in an intense fire. about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Response L110-3.

L110-A-40 The commenter states that the nearest fire station is in Los Angeles rather than Glendale. Glendale Fire Department Station 23 is located approximately 1.45 miles north of the Project site. There is a Los Angeles Fire Department station located approximately 1.4 miles south of the Project site. Section 4.7 of the Final EIR was revised to note the presence of a Los Angeles Fire Department station located approximately 1.4 miles south of the Project. The City of Glendale has mutual aid agreements for fire response with surrounding municipalities including the Cities of Los Angeles and Pasadena. This mutual aid agreement would apply to a fire at the Project site. The presence or location of the Los Angeles Fire Department station does not change any of the environmental impact determinations in the Draft EIR. The statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-41 The Project will utilize the existing LFG collection and piping system. Potential releases of LFG and associated hazards are analyzed in Sections 4.7 and 4.9 of the Draft EIR. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Response L110-3.

L110-A-42 The commenter states an opinion that hazards impacts of Project operation would be significant. Please also refer to Topical Responses No. 6, 7, and 9.

L110-A-43 The commenter states that the landfill is unlined, that the Project must ensure groundwater protection, and additional groundwater monitoring should be conducted. The Project would include limited activities and sources of potential groundwater degradation. Sources of groundwater contamination during construction would consist of water applied to the ground surface for dust suppression or a spill of petroleum hydrocarbons such as

fuel or lubricants used in construction equipment. Such an accidental surface spill would be subject to immediate clean up protocols. Recycled water from the Los Angeles-Glendale Water Reclamation Plant would be utilized for dust suppression. The source of recycled water would be the same as that used for active landfill activity dust suppressant. Sources of groundwater contamination during operation might occur as a result of an unexpected spill of petroleum hydrocarbons such as oils and lubricants. In the event of an aqueous ammonia spill, the release would be contained within a non-permeable concrete secondary containment and the ammonia would evaporate preventing potential impacts to groundwater. As discussed in Sections 4.7 and 4.8 of the Draft EIR, the Project would not involve large volumes of hazardous materials and would be required to comply with a number of local, state, and federal safety and water quality regulations related to the transportation, use, storage, and disposal of hazardous materials that are intended to be protective of human health and environmental resources. This includes placing hazardous materials and wastes within areas equipped with secondary containment to further reduce the potential impacts of a spill or release. The Project does not include the installation of a conduit to groundwater or involve any other activities that might create a substantial source of potential groundwater degradation which would warrant the installation of groundwater monitoring wells. The statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-44 The commenter requests installation of additional groundwater monitoring wells in Scholl Canyon. Section 20385(a) of Title 27 of the California Code of Regulations requires the discharger of a waste management unit to conduct a water quality monitoring and response program approved by the Regional Water Quality Control Board. The Los Angeles RWQCB adopted Waste Discharge Requirements Order No. R4-2019-0037 (WDR) and Monitoring and Reporting Program No. CI-2846 (MRP) for the active Scholl Canyon Landfill on March 14, 2019 and a site-specific MRP No. CI-10458 (under the RWQCB's General Waste Discharge Requirements for Post-closure Maintenance Order No. R4-2002-022) for the Scholl Canyon Closed Landfill on February 22, 2019. The WDRs and MRPs specify the groundwater monitoring requirements for the active Scholl Canyon Landfill and Scholl Canyon Closed Landfill. The groundwater monitoring system approved by the RWQCB for the active Scholl Canyon Landfill includes 10 on-site monitoring wells immediately down-gradient of subsurface Barrier 1 (M01A, M02B, M03A, M04B, M05A, M06B, M07A, M08B, M09A, and M10B) and three offsite down-gradient monitoring wells (M17A, M18A, and M18B). Groundwater monitoring results are reported semiannually in water quality monitoring reports submitted to the Los Angeles RWQCB. The groundwater monitoring system approved by the RWQCB for the Scholl Canyon Closed Landfill consists of five wells: four monitoring wells MW-1, MW-2, MW-3, and M-12B and one extraction well EX-7. Two wells (MW-3 and M-12B) are located immediately down-gradient of Barrier 2. One well (MW-2) is also located down-gradient of the landfill. One well (MW-1) is located up-gradient of the Closed Landfill. Extraction well EX-7 is also monitored to help evaluate the effectiveness of the barrier. Groundwater

monitoring results are reported semiannually in groundwater monitoring reports submitted to the Los Angeles RWQCB. Please also refer to Responses L110-A-43. The comment is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-45 The commenter states that Per-and Polyfluoroalkyl Substances (PFAS) exceeding remedial objectives have been detected in groundwater monitoring wells. The Project does not include groundwater monitoring or the use of PFAS. Please refer to Response L110-A-46. The comment is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-46 In 1987 a cement-bentonite subsurface barrier (Barrier 1) and groundwater extraction system up-gradient of Barrier 1 were installed at Scholl Canyon Landfill. The effectiveness of the groundwater barrier and extraction system is evaluated pursuant to the Monitoring and Reporting Program for the landfill, issued by the Los Angeles Regional Water Quality Control Board (Regional Water Board). This program requires monitoring the groundwater down-gradient of the landfill. In 2019, as part of a statewide effort to determine whether groundwater is impacted by PFAS and obtain preliminary understanding of PFAS concentrations at landfills, the Los Angeles County Sanitation Districts investigated potential PFAS impacts at the Scholl Canyon Landfill by conducting a groundwater assessment in accordance with a State Water Board investigative order. As described in the Los Angeles County Sanitation Districts report, Groundwater Assessment of Per- and Polyfluoroaklyl Substances (PFAS) for Scholl Canyon Landfill (February 2020), PFAS constituents were detected in all of the samples from down-gradient groundwater wells. The highest levels were detected in the sample from a groundwater extraction well up-gradient of Barrier 1, which discharges the extracted groundwater to the local wastewater sewer and is treated at the Los Angeles-Glendale Water Reclamation Plant. Groundwater samples from the offsite monitoring well near Glenoaks Park had detections of PFOA and PFOS at 5.8 and 3.2 ng/L, respectively. Although PFOA was detected above the California drinking water notification level of 5.1 ng/L at the offsite monitoring well, it is below the California drinking water response level of 10 ng/L. Groundwater in the vicinity of the Scholl Canyon Landfill is not a drinking water source and there are no active drinking water wells located within one-mile radius of the Scholl Canyon Landfill based on the 2019 State Water Board's investigation order to water systems. The City of Glendale Department of Water and Power indicated in their 2019 Water Quality Report that PFOA and PFOS were not present in the water that is served to their customers.

In order to help ensure the quality of the groundwater down-gradient of Scholl Canyon Landfill is protected, the groundwater extraction system up-gradient of Barrier 1 is operated in accordance with the monitoring requirements of the Regional Water Board. Based on the monitoring results and current regulations, the Regional Water Board has not required any additional mitigation measures to be implemented. However, the site operators will continue to work with the Regional Water Board and to monitor regulatory

and scientific efforts to address PFAS and take steps necessary to protect the public health. Please refer to Response L-110-A-45. The comment is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-47 The commenter requests additional groundwater monitoring in Scholl Canyon. The current groundwater monitoring network at the Scholl Canyon Landfill includes 13 groundwater monitoring wells, seven of which are alluvial monitoring (onsite wells M01A, M03A, M05A, M07A, and M09A and offsite wells M17A and M18A) and six of which are bedrock monitoring wells (onsite wells M02B, M04B, M06B, M08B, and M10B and offsite well M18B). Bedrock monitoring wells are designed to monitor the water quality in the fractured bedrock. Please also refer to Responses L110-A-43 to L110-A-46. The comment is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-48 Please refer to Response L-110-A-44.

L110-A-49 Recycled water from the Los Angeles-Glendale Water Reclamation Plant would be utilized for dust suppression. The source of recycled water would be the same as that used for active landfill activity dust suppressant. The Project would utilize the same source of recycled water for dust suppression purposes.

L110-A-50 Secondary containment would consist of steel, concrete, high-density polyethylene, or other suitable material that meets applicable building and fire code requirements. While there may be flexibility in the design and material types of secondary containment that would be confirmed during final design, all materials used would meet regulatory requirements and not lead to new or substantially greater environmental impacts than were disclosed and analyzed in the Draft EIR.

L110-A-51 Any hazardous waste generated by the Project would be handled, stored, and disposed in accordance with applicable regulatory standards.

L110-A-52 The 2,000-gallon lube oil storage tank, 3,000-gallon waste storage tank, and waste accumulation area would be located within the 2.2-acre power plant site. The specific location of the tanks and waste accumulation area would be determined during final design of the Project. The Draft EIR assumes that the tanks and waste accumulation area could be located anywhere within the 2.2-acre power plant site with similar resulting potential environmental impacts.

L110-A-53 The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Responses L94-10 and L94-12.

L110-A-54 The Project is a land use expressly permitted by and would be operated in accordance with the JPA. City of Glendale will operate the Project which is located on County of Los

Angeles owned property, and is a use the is expressly permitted by the JPA. There would be no interface between the Project and the Southern California Edison property.

L110-A-55 The commenter states that there are residential and other land uses within two miles of the Project site that are not identified in the environmental setting. The Draft EIR considers all land uses within resource specific study areas determined by the Project's potential to result in environmental impacts. The statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-56 The purpose of the EIR is to evaluate potential environmental impacts of the Project pursuant with CEQA. The City of Glendale would pursue and be is required to obtain all necessary permits for the Project, including a Conditional Use/Special Recreation Permit, prior to construction and operation. The CEQA process does not dictate that any or all permits necessary for the Project would be issued or that the Project would be implemented. Please also refer to Responses L94-10 and L94-12.

L110-A-57 With respect to consistency finding #1, the proposed Project is consistent with Scholl Canyon Landfill operations which requires the capture and destruction of landfill gases. The Project would not preclude conversion of the landfill to recreation and/or open space after landfill closure. Consistent with the JPA and the General Plan Open Space and Conservation and Recreation Elements. Please refer to Responses L110-A-56, L94-10, L94-12, and Topical Responses No. 1 and 4.

With respect to the general plan consistency finding #2, the Project would not result in an unmitigable significant impact. Please also refer to Topical Responses No. 5, 6, 7, 8 and 9. There is no evidence the Project would impede development of surrounding land uses.

With respect to consistency finding #3, the proposed use of the facility does not adversely affect or conflict with adjacent uses or impede the normal development of surrounding property because the capture and destruction of landfill gases are an operation mandate for the Scholl Canyon Landfill, even after landfill closure. Furthermore, the variance no longer applies to the property as the landfill is a conditionally approved use.

L110-A-58 The Project's potential increase in noise levels would be below the applicable thresholds of significance for CEQA.

L110-A-59 The commenter states an opinion that the noise sources associated with Project operation are very loud. The Project's potential increase in noise levels are below the applicable thresholds of significance for CEQA and the commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-60 Acoustic analysis of the proposed Project's potential operation phase impacts included 31.5-Hz to 8000-Hz octave bands. This range is applicable to evaluating potential noise impacts of the proposed Project because the 31.5-Hz octave band captures the acoustic

energy from 22 Hz to 44-Hz, so it essentially reflects the entire audible frequency range at the lower end. Audible range is typically considered to be between 20 Hz to 20 kHz. Most adults can perceive sound around 20 Hz in the laboratory setting and at levels near 80 dB.

The acoustic energy in the 16-Hz octave band (11 Hz to 22 Hz) is expected to produce levels of below 75 dB at a distance of 100 feet from the power generation facility, which is below the limit of audibility. As a result, there would not be any sensitive receptors exposed to audible noise at 16-Hz octave band. Additionally, this level of airborne acoustic energy is not sufficient to cause any ground-born vibration effects. The nearest residential receptors to the generators are at nearly 3,000 feet away (in the Glenoaks Canyon Road and Blue Hill Road areas). The expected contribution from the proposed Project in 16-Hz octave band would be below 49 dB. This level would not be perceivable to sensitive receptors modeled – even those with hyper-sensitivity to noise - as it is expected to be below the current ambient sound levels in this frequency range, in addition to being much lower than the threshold of perceptibility.

Most of the estimated acoustic energy in 31.5-Hz octave band associated with the proposed Project would be from the reciprocating internal combustion engine generator enclosure walls and roof. The sound level estimates used in the Draft EIR to evaluate potential noise impacts used conservative assumptions regarding the acoustic performance of the enclosures. It is expected that the actual noise emissions from the enclosures would be lower than that assumed in the Draft EIR.

L110-A-61 Noise modeling conducted as part of the Draft EIR utilized baseline noise levels collected at nearby sensitive receptors and site-specific topographic conditions, which are the existing conditions that takes its existing context into consideration. The comment does not specifically identify where the analysis is in fact inadequate. Please refer to Topical Response No. 8 that address potential noise impacts on the Project on adjacent future recreation/open space land uses required by the JPA after landfill closure.

L110-A-62 Ambient noise measurements were collected for 15 minutes at each of the nearest sensitive receptors to the Project site because those receptors would have the highest potential to be affected by Project noise as they would be expected to be subject to higher noise levels than a receptor located farther from the noise source. 15-minute ambient noise measurements are greater than the minimum five-minute measurements required by Section 8.36.030 of the City's Noise Ordinance to establish ambient noise levels, including Leq for the purposes of analyzing potential noise impacts pursuant with CEQA.

L110-A-63 The commenter states that the City did not consider commercial and recreation land use receptors which are an equivalent distance to the residential receptors analyzed in the City's evaluation of potential noise impacts. Residential receptors have lower allowable noise levels than commercial and recreation land use rectors. Therefore, noise levels that



would not significantly impact residential receptors would not be expected to significantly impact non-residential receptors located at an equivalent distance from the noise source. The statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. This is an existing industrial facility and the noise levels analyzed in the Draft EIR take into account the existing operations. Occupational Safety and Health Administration regulations require hearing protection for employees when noise levels exceed 85 dbA averaged over 8 working hours. Employees working at the existing LFG treatment and flaring facility are exposed to elevated noise levels compared to the surrounding sensitive receptors. No significant impacts to noise were identified in the Draft EIR.

L110-A-64 As shown in Table 39 of the Draft EIR, the Project operation would result in an increase in noise above ambient levels. However, the potential increase in noise levels are below the applicable thresholds of significance and is considered less than significant pursuant with CEQA.

L110-A-65 As discussed in Sections 4.10.4.3 and 4.10.4.4 of the Draft EIR, the Project does not include substantial sources of vibration. The engine enclosures will be constructed in accordance with all applicable design requirements including insulation or other materials to reduce sound levels to those at or below the conservative estimates used in the Draft EIR to evaluate potential noise impacts of the Project.

L110-A-66 The comment is an opinion that the Draft EIRs definitions of "the existing roadway system" and "the vicinity" are too restrictive and underestimate the Projects impacts on transportation. The commenter does not provide any justification for perceived impact underestimates or evidence that the Project's transportation impacts are underestimated. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-67 Please refer to Topical Responses No. 1 and 8.

L110-A-68 Existing vehicular emissions are part of the baseline air quality conditions utilized in the Draft EIR. Please also refer to Topical Responses No. 1 and 8.

L110-A-69 Please refer to Topical Response No. 8.

L110-A-70 As discussed in Section 4.11 of the Draft EIR, the increase in Project-related construction traffic would not exceed the applicable thresholds of significance and would be less than significant. This was a conservative analysis as it assumed all Project-construction trips would occur during peak hours. The existing traffic conditions utilized in the traffic modeling were collected during peak hours and therefore consider existing traffic such as those associated with active landfill operations. Project operation would not result in increasing vehicle trips substantially beyond those that already occur at the site for LFG collection and flaring operations. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.



Please also refer to Section 4.11.4.3 of the Draft EIR that demonstrates the Project would have a less than significant transportation and traffic impact.

L110-A-71 The comment is speculative and provides no evidence of where the garbage and construction trucks are going or coming from. Please refer to Topical Response No. 8, Section 4.11.4.3 of the Draft EIR, and Response L110-3.

L110-A-72 Please refer to Topical Response No. 8.

L110-A-73 Please refer to Topical Responses No. 8 and 9.

L110-A-74 The Project has been designed to meet applicable storm water and/or wastewater discharge limits. The permits for such discharges include monitoring and reporting conditions with which that the City would be required to comply with. The 3,500-foot-long natural gas pipeline is not included in Section 4.13 of the Draft EIR because it is a component of the Project that is evaluated in numerous other resource-specific sections of the Draft EIR including but not limited to Sections 4.1 (Air Quality), 4.2 (Biological Resources), 4.7 (Hazards and Hazardous Materials), and 4.14 (Wildfire). Section 4.13 has been revised to provide a reference to other sections of the EIR that analyze potential environmental impacts from construction and operation of the natural gas pipeline. The natural gas pipeline is proposed to be installed above ground except under road crossings to address potential landfill settlement and potential damage to the pipeline integrity.

L110-A-75 Please refer to Topical Response No. 9.

L110-A-76 Please refer to Topical Responses No. 6 and 9.

L110-A-77 The Project's dispersion analysis of airborne pollutants considered meteorological conditions recommended by the SCAQMD for the Project area. The commenter states that high wind speeds could affect fire suppression. Please also refer to Topical Response No. 9. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-78 The Project would be required to adhere to the City of Glendale's Fire Code, including vegetation clearance requirements. The Project does not include weed abatement or brush clearance beyond the proposed project facilities and is not part of a larger weed or vegetation management program. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-79 Please refer to Topical Responses No. 8 and 9.

L110-A-80 Please refer to Topical Responses No. 8 and 9.

L110-A-81 Please refer to Response L110-A-78.

L110-A-82 Please refer to Topical Responses No. 6, 7, and 9.

L110-A-83 Glendale Fire Department Station 23 is located approximately 1.45 miles north of the Project site. There is also a Los Angeles Fire Department station located approximately 1.4 miles south of the Project site. The City of Glendale has mutual aid agreements for fire response with surrounding municipalities including the Cities of Los Angeles and Pasadena. This mutual aid agreement would apply to a fire at the Project site. Please refer to Topical Response 9.

L110-A-84 The comment states that stringent fuel modification ordinances have not been enforced. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-85 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-86 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-87 Please refer to Topical Response No. 9.

L110-A-88 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 7.

L110-A-89 Please refer to Topical Response No. 7.

L110-A-90 Please refer to Response L110-13.

L110-A-91 Please refer to Response L110-13.

L110-A-92 Please refer to Response L110-13.

L110-A-93 Table 55 is accurate in demonstrating that the No Project Alternative would have higher greenhouse gas emission impacts compared to the proposed Project. This is a result of both the No Project and the proposed Project combusting the same volume of LFG. However, the proposed Project would combust the LFG in cleaner more efficient internal combustion engines, and further, because the Project would generate renewable



electricity, the City's reliance on and use of electricity generated from non-renewable sources would be commensurately reduced, which reduces the volume of GHGs compared to combustion in the flares that provides no renewable energy/greenhouse gas emissions benefit. Section 4.6 provides data on baseline flare emissions. Please also refer to Topical Response No. 10.

L110-A-94 Please refer to Response L110-13.

L110-A-95 Please refer to Response L110-13.

L110-A-96 Please refer to Response L110-13. Construction and operation phases of the proposed Project would not overlap. Applicable construction and operation phase thresholds of significance were used in the EIR to determine potential significance of proposed Project impacts as well as those from evaluated alternatives.

L110-A-97 Alternative 2 considers gas treatment at Scholl Canyon Landfill. Grayson Power Plant does not have adequate space available for a gas treatment and RNG production facility. Please also refer to Topical Response No. 10.

L110-A-98 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-99 Alternative 2 would have greater potential geology and soils impacts due to the increased grading and land development size required for Alternative 2 compared to the proposed Project. The commenter does not provide sufficient specifics related to their concerns to support their conclusions about the alternative evaluation in the Draft EIR and does not raise an environmental question. Please also refer to Topical Responses No. 7, 9, and 10. Alternative 3 would have greater transportation impacts than the proposed Project as described in Section 5.6.3.2 of the Draft EIR. Table 55 of the Draft EIR that indicates "similar" transportation impacts to the proposed Project has been corrected to "greater" in the EIR errata. As noted in Section 5.6.4.2 of the Draft EIR, while the geologic conditions vary between the two sites, both Alternative 4 and the proposed Project would be designed in accordance with applicable building code requirements that take into account site-specific geologic conditions, seismic safety design, and soil settlement considerations. Alternative 4 and the proposed Project would incorporate similar construction stormwater best management practices and stormwater/industrial drainage facilities/requirements during operation. Additionally, the size and scale of Alternative 4 and the proposed Project would be equivalent. Therefore, potential geology and soils and water quality impacts of Alternative 4 and the proposed Project were determined to be similar.



L110-A-100 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-101 Please refer to Topical Response No. 5.

L110-B-1 This comment introduces the attached comment letter, provided by Soil Water Air Protection Enterprise (SWAPE) to the Glenoaks Canyon Homeowners Association. The comment lists the alternatives analyzed in the Draft EIR.

L110-B-2 Please refer to Response L110-13.

L110-B-3 Please refer to Response L110-13.

L110-B-4 The comment expresses support of Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-B-5 Please refer to Topical Response No. 1.

L110-B-6 Please refer to Topical Responses No. 5 and 10.

L110-B-7 Reciprocating internal combustion engines were selected for the proposed Project due to their ability to operate on low methane content fuels such as LFG. Turbines were not selected as the generation technology due to their inability to operate on LFG without higher percentages of natural gas supplements. Please refer to Topical Responses No. 5.

L110-B-8 The comment expresses support of Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 10.

L110-B-9 Please refer to Topical Responses No. 1, 5, and 7.

L110-B-10 Please refer to Topical Response No. 1.

L110-B-11 The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L111 - Responses to Comments from Kelly, Robert, Graham and Gabriel Scherer, received September 28, 2020

L111-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or

CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L111-2 Please refer to Topical Response No. 9.

L111-3 Please refer to Topical Response No. 5.

L111-4 Please refer to Topical Responses No. 6, 7, and 9.

L111-5 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L111-6 Please refer to Topical Response No. 1.

L112 - Responses to Comments from Liz Amsden, received September 28, 2020

L112-1 The commenter expresses their support of the No Project alternative. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L112-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 10.

L112-3 Please refer to Topical Response No. 1.

L112-4 LFG is a naturally occurring by-product of the waste decomposition process at landfills. Additionally, please refer to Topical Response No. 1.

L112-5 Please refer to Topical Responses No. 1 and 5.

L112-6 South Coast Air Quality Management District (SCAQMD) and federal regulations mandate that LFG must either be flared or captured and converted to energy. The flaring of LFG at Scholl Canyon Landfill is permitted under existing SCAQMD permits. Flaring destroys harmful greenhouse gases, such as methane, that are a natural by-product of the landfill decomposition process, however, the energy produced from such burning is being lost. The Project will capture that the LFG and put it to beneficial use as an energy source that qualifies for the City's renewable portfolio standard.

L112-7 The life of the Project is anticipated to be 20 years, or as long as the LFG can be used to generate electricity; after which time equipment and equipment foundations would be removed. Any remaining LFG that is continued to be produced at the landfill after the life of the proposed Project would be managed through a reasonably foreseeable future action that cannot be predicted with reasonable certainty and is therefore excluded from the scope of the Project's Draft EIR. Please also refer to Topical Response No. 1.

L112-8 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L112-9 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L112-10 Please refer to Topical Response No. 8. The Project does not alter the existing access to the Scholl Canyon Landfill.

L112-11 Please refer to Topical Responses No. 1 and 5. The commenter has presented no evidence to support the statement that particular or other airborne pollutants are associated with the Scholl Canyon Landfill or the Project.

L112-12 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.

L112-13 Please refer to Topical Responses No. 6, 7, and 9.

L112-14 The comment is a general statement about the commenter's opinion of (or preference about) the Project. Commenter references "'an original agreement' with LA County that the right to use the property was for 17 years or until it has served its purpose, whichever first occurs." The reference is to a 1961 agreement, which was superseded by the 1997 JPA. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.

L112-15 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or



CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 1 and 5.

L112-16 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.

L112-17 Please refer to Topical Response No. 1.

L112-18 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.

L112-19 Please refer to Topical Responses No. 4 and 5.

L112-20 Please refer to Topical Responses No. 3, 5, and 8.

L112-21 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L112-22 Please refer to Topical Responses No. 6, 7, and 9.

L112-23 Please refer to Topical Response No. 5. The Project's emissions of GHGs are below the SCAQMD thresholds of significance.

L112-24 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 7.

L112-25 The CEQA Guidelines specify that reliance on compliance with a regulatory permit or similar process is sufficient mitigation if compliance with such standards can be reasonably expected, based on substantial evidence, to reduce the impact to the specified performance standard. 14 Cal Code Regs §15126.4(a)(1)(B). Compliance with relevant regulatory standards can provide a basis for determining that the project will not have a significant environmental impact. *Tracy First v City of Tracy* (2009) 177 CA4th

912. See *Oakland Heritage Alliance v City of Oakland* (2011) 195 CA4th 884, 906, "a condition requiring compliance with regulations is a common and reasonable mitigation measure and may be proper where it is reasonable to expect compliance." The court upheld the city's reliance on standards in the building code and city building ordinances to mitigate seismic impacts. A long line of court cases has upheld compliance with regulatory standards as adequate mitigation. See, e.g., *King & Gardiner Farms, LLC v County of Kern* (2020) 45 CA5th 814, 860 (compliance with applicable standards for treatment of water for agricultural use); *Center for Biological Diversity v Department of Fish & Wildlife* (2015) 234 CA4th 214, 245 (compliance with federal regulations for hatchery genetic management plan is reasonable mitigation measure); *Citizens Opposing a Dangerous Env't v County of Kern* (2014) 228 CA4th 360, 383 (compliance with Federal Aviation Administration procedures held to be appropriate mitigation for aviation safety impacts); *Leonoff v Monterey County Bd. of Supervisors* (1990) 222 CA3d 1337, 1355 (upholding mitigated negative declaration that included requirement that project comply with environmental laws on registering hazardous materials and monitoring underground tanks for leaks); *Sundstrom v County of Mendocino* (1988) 202 CA3d 296, 308 (upholding measures in mitigated negative declaration requiring compliance with air and water quality standards); *Perley v Board of Supervisors* (1982) 137 CA3d 424 (upholding mitigated negative declaration that included compliance with requirements of various environmental agencies among its mitigation measures).

L112-26 The City would construct and operate the Project in compliance with all applicable regulation, including, but not limited to those related to hazardous materials and waste disposal. See Response L112-25 and Topical Response 7.

L112-27 Please refer to Topical Responses No. 6, 7, and 9.

L112-28 Please refer to Topical Response No. 8 and Response to L117 below. Please also refer to Section 4.3.4 of the Draft EIR for an analysis of Project impacts to Biological Resources, including wildlife.

L112-29 Please refer to Topical Responses No. 7 and 9.

L112-30 The commenter stresses the comments made throughout the letter and reiterates their support for the No Project alternative. Please refer to Topical Responses No. 1, 4, 5, 6, 7, and 8.

L112-31 The comment is a general statement about the commenter’s opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter’s statement is included in the Final EIR for the decision-maker’s consideration as part of the City’s deliberations on the Project.

L113 - Responses to Comments from Mary Fischer, received September 28, 2020

L113-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. The commenter attached an article from www.citywatchla.com titled, *In the Plus Column of Huizar's Legacy*, written by Liz Amsden. The comments reflected in the article are also stated in the comment letter received from Liz Amsden on September 28, 2020. Therefore, please refer to responses to comments of L112 from Liz Amsden, received September 28, 2020.

L114 - Responses to Comments from Rona Compton, received September 28, 2020

L114-1 The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate power. Please also refer to Topical Responses No. 5, 7, and 9.

L115 - Responses to Comments from Tobin Wills, received September 28, 2020

L115-1 The commenter expresses concern over the location of the proposed Project stating the opinion that it is too close to residences. The Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than continuing to flare the LFG, the proposed Project seeks to capture the LFG and beneficially use the energy produced from combustion of the LFG to generate power which will assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced from the landfill decomposition process for many years and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation.

L115-2 Please refer to Topical Responses No. 4 through 9.

L115-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making.

L116 - Responses to Comments from Audry Zarokian, received September 29, 2020

L116-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L116-2 Please refer to Topical Responses No. 6, 7, and 9.

L116-3 Please refer to Topical Response No. 5.

L116-4 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. Please also refer to Topical Responses No. 5 and 10.

L116-5 Please refer to Topical Response No. 5.

L116-6 The comment is a general statement about the commenter's opinion of (or preference about) the Project. Please refer to Topical Response No. 5.

L116-7 Please refer to Topical Response No. 5.

L116-8 Please refer to Topical Responses No. 6, 7, and 9.

L116-9 Please refer to Topical Response No. 1.

L117 - Responses to Comments from California Department of Fish and Wildlife (CDFW), received September 29, 2020

L117-1 The comment is a general statement acknowledging the commenter's review the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L117-2 The comment is a general statement noting the commenter's role as a California Trustee Agency for fish and wildlife resources and their responsibility in the CEQA review process. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L117-3 The comment is a general statement noting the commenter's understanding of the Project components and location. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with

CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L117-4 The commenter is providing comments and recommendations to assist the City in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L117-5 The commenter describes concerns regarding the timing of botanical surveys conducted within the Project's BSA, recommends focused floristic surveys, recommends species specific mitigation measures, and provides guidance on suggestions on reporting. The City shall conduct focused floristic surveys prior to construction. Mitigation measure BIO-4 has been updated to include focused and appropriately timed floristic surveys the spring before construction is set to commence; this also includes preparation of a floristic survey report. The measure as currently written requires the avoidance of both State and/or federally listed plants with the appropriate agencies notified if any are sensitive floristic species are observed. Additional text has also been added to address CRPR species. Please refer to Response L117-11 for the updated measure. In response to recommended Mitigation Measure #4, the City will adopt a Mitigation Monitoring and Reporting Program for the Project that addresses "take authorization" under the CESA, addresses early consultation, and contains sufficient detail to satisfy CESA ITP requirements. With respect to Recommendation #1, BIO-4 has been updated to address the commenter's concerns. With respect to Recommendation #2, numerous surveys were conducted and rare plants were not observed. The City will conduct additional rare plant surveys prior to construction pursuant with CDFW's recommendation. Based on the extent of survey results conducted to date there is no map or table showing locations of rare plants that could be impacted because no such rare plants were observed and therefore, no species-specific measures for on-site mitigation are required. With respect to Recommendation #3, the City does not propose transplanting or salvaging rare plants within the Project impact area as no rare plants have been detected. With respect to Recommendation 4, the City will complete and submit CNDDB forms for any special-status species observed during pre-construction surveys.

L117-6 The commenter references measures and information from the Draft EIR regarding activities near and permit requirements for impacting jurisdictional aquatic features, notes concern about missing aquatic feature information on Figure 3 in the BRTR, recommends the preparation of a hydrology study, and the addition of mitigation measure text regarding permit requirements.

All of the National Wetlands Inventory (NWI) aquatic features noted in the Draft EIR, while occurring in the Biological Study Area (BSA), do not occur in any of the proposed

Project impact areas. The Project site is situated at an elevation higher than the noted features and these features would not be impacted by the Project. The concrete lined channels, that may be CDFW jurisdictional waters, are not expected to be impacted because the Project has been designed such that all gas and water pipelines would be installed over or below all potentially jurisdictional features. It is noted that the 0.13 acre freshwater pond occurring in the southeastern extent of the BSA was not described in the Draft EIR; the EIR errata identifies this feature within the BSA.

Construction of the Project is not expected to result in the discharge of sediment and fill, increased erosion and sediment transport, or the degradation of water quality that would impact headwater streams and downstream waterbodies because all the pipelines are proposed above ground which will result in minimal ground disturbing activities. The Project will be constructed almost entirely within a previously disturbed area. While some grading will be required for the water tank installation, the Project will be subject to general construction Best Management Practices (BMPs) that will require measures be in place to prevent erosion and sediment transport from all construction areas.

Because measures would be in-place to prevent erosion and sediment transport, and because there would be no direct impacts to jurisdictional aquatic features, a hydrology study is not proposed as part of the Project. The City will provide an additional figure in the FEIR that shows the NWI mapped features that occur within the BSA. Based on the proposed Project design there would be no impacts to CDFW jurisdictional waters, and as such, an application for a Lake and Streambed Alteration Agreement (LSAA) is not required for Project construction or operation. Because obtaining a LSAA is not required for the Project, a mitigation measure to ensure compliance with a regulatory standard not applicable to the Project is not required. With respect to Mitigation Measures #1 and #2 and Recommendation #1, the reasons why the recommended mitigations are not necessary is set forth herein above in this Response L117-6.

L117-7 The commenter provides information in impacts related to habitats within proposed Project area, discusses the pros and cons of habitat restoration, recommends a higher compensation ratio for permanent impacts to native vegetation communities, requests that permanent and temporary impact areas be symbolized on a figure, questions the reported percentage of native habitat impacted, recommends removing references to wetlands or riparian habitat as they do not exist in the BSA, and suggests removing the reference to off-site creation or enhancement of California sycamore woodlands and southern riparian scrub and updating to reflect the laurel sumac scrub and California sagebrush-California buckwheat scrub that occurs in the Project areas.

The Project EIR discloses that the Project will result in impacts to native vegetation communities. Both laurel sumac scrub and California sagebrush-California buckwheat scrub have a Global Rank of G4 and a State Rank of S4 and are not considered rare. S1-S3 rank are generally evaluated under CEQA, as are any locally protected species. In response to the comment, BIO-7 in the Draft EIR (now Mitigation Measure BIO-8 in the



Final EIR) has been updated to require a 3:1 mitigation ratio (up from the recommended 2:1 in the Draft EIR) for permanent impacts to all native communities for on or off-site restoration/creation and will include the recommended 2:1 ratio for participation in a mitigation bank program; the ratio for temporary impacts will remain at 1:1. The text regarding wetlands in the measure will be removed. The revised measure is presented below. Please note that the exact mitigation edits requested by the Commenter to BIO-~~7~~8 were not adopted verbatim because different mitigation standards are required for temporary and permeant impacts, however, the total acreage impacted is accurate. With respect to Mitigation Measure #3 and #4, the commenter's concerns are addressed in the edits below.

BIO-~~7~~8 Vegetation Removal and Replacement

Construction activities shall be done in such a manner as to minimize the removal of native vegetation. If impacts to native vegetation removal cannot be avoided, all temporarily impacted plant communities shall be restored on-site at a mitigation ratio of 1:1; the Project will temporarily impact 0.16 acres of California sagebrush-California buckwheat scrub and 0.45 acres of laurel sumac scrub. The compensation for the permanent loss of habitats may be achieved either by: a) on-site habitat creation or enhancement of impacted communities with similar species compositions to those present prior to construction; b) off-site creation or enhancement of laurel sumac scrub and California sagebrush-California buckwheat scrub ~~California sycamore woodlands and southern riparian scrub~~ communities; or c) participation in an established mitigation bank program. Permanent impacts to native communities shall be restored/mitigated at a 3~~2~~:1 ratio for on or off-site habitat restoration/creation or at a 2:1 ratio for participation in an established mitigation banking program; the Project will permanently impact 0.06 acres of California sagebrush-California buckwheat scrub and 2.76 acres of laurel sumac scrub. ~~Sensitive communities, including jurisdictional wetlands, shall be restored/replaced at a mitigation ration of 2:1 for all temporary and 3:1 for all permanent impacts.~~

Prior to the start of any project related activities (including removal of native vegetation), if on or off-site mitigation is required, an ecosystem-based Habitat Mitigation and Monitoring Plan shall be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques that will guide all restoration and monitoring activities. This plan shall include, at a minimum, the following:

- Provide the total acreage of unique sensitive vegetation communities impacted, and abundance, density, and cover of each plant species and vegetation layer impacted (i.e. ground cover, forbs, subshrub, shrub, and trees).

- Provide the specific location of on- and/or off-site mitigation area(s) and a science based factual discussion as to why the mitigation area(s) is appropriate for mitigating Project-related impacts. Describe the environmental features (i.e.,

soils, slope, existing vegetation, hydrology) that would suggest the mitigation area(s) can support the vegetation and wildlife impacted by Project activities.

- Provide a vegetation survey conducted at a reference site containing the vegetation communities being mitigated, with as good or better quality habitat, to document the density, abundance, diversity, and percent cover for each species by vegetation layer.

- A schematic depicting the mitigation area.

- Proposed species list for creation/enhancement~~;~~. A plant palette shall consist of species that are diverse with respect to growing duration (annual, perennial), life form (grasses, shrubs, trees, vines), and structure (ground cover, shrubs, tree canopy) that form the vegetation alliance that is being mitigated.

- Planting/seeding methodology~~;~~ (e.g., sources of local propagules, container sizes, and seeding rates).

- Planting schedule.

- Irrigation plan.

- Weeding schedule~~;~~ and invasive plant control methods that reduces or eliminates the use of chemicals.

- Success criteria.

- Monitoring methodology and schedule~~; and~~ extended across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

- Reporting requirements.

- Prior to any Project construction and activities, the perimeter of the 3.37 acres of laurel sumac scrub and California sagebrush-California buckwheat scrub be clearly delineated by temporary stakes, flags, or other clearly identifiable system. Fencing will be accompanied by signage. During WEAP, workers will be advised not to cut, clear, pull, or trample vegetation; toss or pile debris and garbage; or otherwise impact vegetation beyond the demarcated area. Temporary fencing and signage should be maintained for the duration of the Project and removed after Project construction and activities are completed.



{End of edits to Mitigation Measure BIO-~~7~~8}

For delineation of the permanent impact boundaries within the native plant communities refer to the Response for L117-14 below for additional details. With respect to Recommendations #1 through #4, the City responds as follows. (Please note, Recommendation #4 was addressed in the edits to BIO-~~7~~8 above). The City has provided a map/figure in the FEIR that shows the extent of the temporary and permanent impact boundaries. References to creation or enhancement of California sycamore woodlands and southern riparian scrub will be removed and replaced with California sagebrush-California buckwheat scrub and laurel sumac scrub.

The commenters notations regarding the overall percentages of native habitats impacted by the Project were reviewed and the impact percentages recalculated. Overall, including temporary and permanent impacts, 50 percent of the impacts will occur within native habitats with the remaining in non-native habitats or disturbed/developed lands. This also includes the areas within 100-feet of the Project facility and water tank installation area subject to fire/brush clearance. The majority of impacts to native habitats are within this clearance zone. The numbers reported in the Draft EIR will be updated. An updated table of impacts, that better reflects the types of impact areas will be provided in the FEIR and is provided below. The table below does not include percentage of impacts as there is no CEQA threshold of significance based on percent impacts to vegetation communities.

Vegetation Community / Land Cover Type		**Total Acres in Survey Area**		**Project Impacts**				
				2019 Survey (Acres)*			**2017 Survey (Acres)**	
					Perm			
2019 Survey	**2017 Survey**	**2019 Survey (Acres)**	**2017 Survey (Acres)**	**Temp**	**Power Plant, Water Tanks, and Pipeline**	**Fire/Brush Clearance**	**Temp**	**Perm**
Annual Brome Grassland	--	10.48	--	0.22	0.15	0.65	--	--
Black Sage Scrub	California Encelia-Black Sage Scrub	8.0	5.67	--	--		--	--
California Buckwheat Scrub	--	1.75	--	--	--		--	--
California Sagebrush Scrub	California Sagebrush Scrub	0.44	0.31	--	--		--	--
California Sagebrush-California Buckwheat Scrub	California Buckwheat Scrub	2.84	7.11	--	0.16	0.06	0.02	0.29
Chamise chaparral	Scrub Oak - Chamise Chaparral	4.82	2.40	--	--		--	--
Coast live oak woodland	Coast live oak woodland	2.95	1.3	-	--		--	--

Vegetation Community / Land Cover Type		Total Acres in Survey Area		Project Impacts				
Fountain Grass Swards	--	14.49	--	0.34	0.03		--	--
Laurel Sumac Scrub	Lauren Sumac Chamise Scrub	70.57	50	0.16	0.45	2.76	0.09	0.39
Developed / Disturbed	Cleared / Developed	87.16	86.75	0.91	1.39	2.33	1.13	1.45
Ornamental Woodland	Ornamental/ Non- Native	31.75	39.14	0.42	0.05		0.92	0.06
Total		**235.25**	**192.68**	**2.06**	**2.22**	**5.80**	**2.16**	**2.19**

*These acreages include impacts related to updated Fire Department brush clearance requirements not required as part of the 2017 impact acreage calculations.

L117-8 The commenter states that they have concerns about Project impacts to trees and/or their root zones specifically note concerns regarding oak trees. The gas and water pipelines occur adjacent to areas mapped as Oak Woodlands along a section of the gas pipeline in the southern portion of the BSA. Both the gas and water pipelines will be installed above ground with footings that will not require trenching or excavation. Therefore, the Project will not directly impact trees or associated root zones within Oak Woodland habitats; this applies to locations where the pipelines occur within areas mapped as Ornamental Woodlands. The Project will be required to adhere to all applicable regulatory requirements, including the City of Glendale's Indigenous Tree Protection Ordinance (Chapter 12.44 of the GMC).

L117-9 The commenter states they are concerned that Project related impacts to Crotch bumble bee (*Bombus crotchii*) may be significant and additional surveys are required. Ground disturbance in the form of grading is only required as part of the Project's new facilities and water tank installation areas. The vast majority of these areas are already disturbed; the water tank installation area occurs in a predominantly undisturbed area with native vegetation. Given the fact that the pipelines are being installed above ground, ground disturbing activities related to the pipelines will be limited to footing installation. There has been no documented occurrence within the Project vicinity in more than 20 years and the commenter has provided no substantial evidence to support imposition of the recommend mitigation measure.

L117-10 The commenter states that they are concerned that protocol surveys for coastal California gnatcatcher (*Polioptila californica californica*) were not conducted and that the provided avoidance, minimization, and mitigation measures are inadequate for this species. As detailed in mitigation measure BIO-5 pre-construction surveys for nesting and breeding birds will be conducted prior to the start of construction activities. As noted in the Response L117-12 additional text will be included as part of this measure to require that vegetation removal take place outside the recognized nesting season. The City understands that this species, while preferring coastal sage scrub habitats, may

utilize other vegetation communities. Per the requirements of BIO-5 a minimum of a 300-foot buffer would be implemented if a nest were to be found during construction activities. For some species, such as coastal California gnatcatcher, should they be present, a larger buffer may be implemented. If a no activity buffer for this or other species extends into a construction area those activities would be postponed until the young fledge the nest or the nest fails (due to natural conditions). With these measures in place, the City does not propose to complete protocol surveys for this species.

L117-11 The commenter recommends additional language be added to existing mitigation measures to provide additional specificity to survey methods, relocation efforts, and protection measures for non-listed special-status wildlife species; they also suggest adding species specific measures. It is not necessary to add new mitigation measures in response to these comments because much of the suggested text has been incorporated into existing mitigation measures to provide additional specificity. See below for updated mitigation measures. Some of the proposed language from the commenter is already included in proposed measures below as they appeared in the Draft EIR.

BIO-1: Implement a Worker Environmental Awareness Program.

Prior to any Project activities on the site (i.e., surveying, mobilization, fencing, grading, or construction), a Worker Environmental Awareness Program (WEAP) shall be prepared and implemented by a qualified biologist(s). The WEAP shall be finalized and administered prior to construction mobilization, and implemented throughout the duration of the construction activities, such as when new contractor employees or subcontractors begin working on-site.

- The WEAP shall include, at a minimum, the following items:
    - Training materials and briefings shall include but not be limited to: a discussion of the federal and state Endangered Species Acts, Bald and Golden Eagle Protection Act, and the Migratory Bird Treaty Act; the consequences of non-compliance with these acts; identification and values of plant and wildlife species and significant natural plant community habitats; hazardous substance spill prevention and containment measures; a contact person and phone number in the event wildlife needs to be relocated or dead or injured wildlife is discovered; and a review of mitigation requirements.
        - A discussion of measures to be implemented for avoidance of the sensitive resources discussed above and the identification of an onsite contact in the event of the discovery of sensitive species on the site; this shall include a discussion on microtrash.
        - Protocols to be followed when roadkill is encountered in the work area or along access roads and the identification of an onsite representative to whom the roadkill will be reported. Roadkill shall be reported to the appropriate local animal control agency within 24 hours.

  - Maps showing the known locations of special-status wildlife, populations of rare plants and sensitive vegetation communities, seasonal depressions and known waterbodies, wetland habitat, exclusion areas, and other construction limitations (e.g. limited operating periods, etc.). These features shall be included on the proposed Project plans and specifications drawings.
  - Literature and photographs or illustrations of potentially occurring special-status plant and/or wildlife species shall be provided to all Project contractors and heavy equipment operators.

- Evidence that all onsite construction and security personnel have completed the WEAP prior to the start of site mobilization. A special hardhat sticker or wallet size card shall be issued to all personnel completing the training, which shall be carried with the trained personnel at all times while on the proposed Project site. All new personnel shall receive this training and may work in the field for no more than five days without participating in the WEAP, accompanied by staff that has undergone the training. A log of all personnel who have completed the WEAP training shall be kept on-site.
- The contract specification books shall include all project conditions as they relate to biological resources and shall be kept on-site at all times (e.g., in the break room, construction foreman's vehicle, construction trailer, etc.) for the duration of the construction. This information shall be easily accessible for personnel in all active work areas.
- Develop a standalone version of the WEAP, that covers all previously discussed items above, and that can be used as a reference for maintenance personnel during Project operations.
- An environmental monitor shall be retained during construction of the proposed project and shall be directly involved with the implementation and enforcement of the WEAP. A log of all personnel who have completed the WEAP training shall be kept on-site.

BIO-3 Implement Biological Construction Monitoring

Prior to the commencement of ground disturbance or site mobilization activities, the City of Glendale shall retain a qualified biologist(s) to monitor Project construction. The biologist will have demonstrated expertise with special- status plants, terrestrial mammals, reptiles, and birds; the qualified biologist shall have or must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities. Monitoring will occur continuously during initial ground disturbance for the duration of Project construction activities. Once initial ground disturbance is complete, monitoring will occur periodically during all construction activities within these areas. Activities related to the installation of the gas and water pipelines should be monitored daily for the duration of construction (not just initial ground disturbance). The qualified biologist(s) shall also be present at all times during ground-disturbing activities immediately adjacent to, or within, habitat that supports populations of listed or special- status species. Any special-status plants shall



be flagged for avoidance. Any special-status terrestrial species found within a Project impact area shall be relocated by the authorized biologist to suitable habitat outside the impact area; relocation will be guided by the species specific list (or plan) as described further below in this measure. Surveys for special-status species shall be conducted by the authorized biologist prior to the initiation of construction each day prior to Project construction activities ~~during initial ground disturbance, and weekly thereafter~~. Pre-construction clearance surveys should be conducted within the entirety of Project site. If nesting birds are found during the pre-construction surveys, buffers shall be installed as prescribed in Mitigation Measure BIO-5 Conduct Pre-construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures discussed below.

If, during construction, the biological monitor observes a dead or injured special-status wildlife species on the construction-site; the City of Glendale, CDFW, and USFWS (as appropriate) should be notified by the end of the work day or the following morning if the required agency office is closed. A written report shall be sent to the City of Glendale, CDFW, and USFWS (as appropriate) within ~~five~~ three (3) calendar days. The report will include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Injured animals will be taken immediately to the nearest appropriate veterinary or wildlife rehabilitation facility. The biological monitor shall, immediately upon finding the remains or injured animal, coordinate with the onsite construction foreman to discuss the events that caused the mortality or injury, if known, and implement measures to prevent future incidents. Details of these measures shall be included with the report. Work in the immediate area may only resume once the proper notifications have been made and additional measures have been identified to prevent additional injury or death. Species remains shall be collected and frozen as soon as possible, and CDFW and USFWS, as appropriate, shall be contacted regarding ultimate disposal of the remains.

A qualified biologist should prepare a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas. The list (or plan) of protocols should be implemented during Project construction and activities/biological construction monitoring. The qualified biologist, in coordination or on behalf of the City, may consult with CDFW to prepare species-specific protocols for proper handling and relocation procedures.

BIO-4 Conduct Pre-construction Floristic Plant Surveys

The City shall conduct two appropriately timed floristic surveys, following current CDFW and CNPS protocols, within the Project impact areas and within a 100-foot buffer in the spring/summer prior to the start of construction. Upon completion of the surveys a detailed report will be prepared and provided to the USFWS and/or CDFW for review; all occurrences of special-status species will be flagged in the field and GPS coordinates obtained for each individual or population.



Prior to the start of construction activities (including vegetation removal) a qualified biologist(s) will conduct pre-construction surveys for state and federally Threatened, Endangered, Proposed, Petitioned, Candidate, and Special-status Plants and Avoid Any Located Occurrences of Listed Plants or Perform other Conservation Strategy. The City of Glendale shall conduct focused surveys for federal- and state-listed and other special-status plants. All special-status plant species (including listed threatened or endangered species, and all CRPR 1A, 1B, 2, 3, and 4 species) subject to disturbance shall be documented in a pre-construction survey report. Surveys shall be conducted during the appropriate season in all suitable habitat located within the proposed Project disturbance areas and within 100 feet of disturbance areas and access roads and be conducted by a qualified botanist. The field surveys and reporting must conform to current CDFW botanical field survey protocols (CDFW, 2009) or more recent updates, if available. The report will describe any conditions that may have prevented target species from being located or identified, even if they are present as dormant seed or below-ground rootstock (e.g., poor rainfall, recent grazing, or wildfire).

If federally or state-listed and/or CRPR 1 or 2 plants are detected in disturbance areas or within 100-feet of the disturbance areas, the City of Glendale would avoid these populations and notify the USFWS and CDFW as appropriate.

The City of Glendale shall avoid impacts to any state or federally listed plants to the extent feasible. If Project activities result in the loss of more than 10 percent of the known individuals within a special-status plant species (List 3~~1.B~~ and List 4~~2~~ only) occurrence/population to be impacted, the City of Glendale shall consult with USFWS and CDFW regarding the most appropriate conservation strategy for the particular species being impacted.

BIO-6 Conduct Surveys for Terrestrial Herpetofauna and Implement Monitoring, Avoidance, and Minimization Measures

Prior to ground disturbance or vegetation clearing at all Project locations, the City of Glendale shall retain a qualified biologist to conduct surveys for terrestrial herpetofauna where suitable habitat is present and directly impacted by construction vehicle access. Surveys should place an emphasis towards identifying any Species of Special Concern (SSC) including (but not limited to) the southern California legless lizard; California glossy snake; coastal whiptail; coast horned lizard; and San Diego desert woodrat. Focused surveys shall consist of a minimum of three daytime surveys and one nighttime survey within one week of vegetation clearing. The qualified biologist will be present full time during all vegetation removal activities immediately adjacent to or within habitat that supports terrestrial herpetofauna, and part time for all remaining activities. Surveys for terrestrial herpetofauna shall be conducted by the qualified biologist prior to the initiation of each day of vegetation removal activities in suitable habitat. Terrestrial herpetofauna found within the area of disturbance or potentially affected by the proposed Project will be relocated to the nearest suitable habitat that will not be affected by the proposed Project.



L117-12 The commenter recommends adding language to BIO-5 that prohibits construction activities from Jan 1 through Aug 31 to fully avoid impacts to nesting birds. BIO-5 currently provides for surveys and the implementation of no work activity buffers during construction. Given the duration of Project construction (15-18 months) it will not be feasible to complete all construction work outside of the nesting season. Additional text was included in BIO-5 that requires all initial vegetation removal activities to be conducted outside of the recognized nesting season to prevent direct impacts to nesting birds. Text was also included that recommends construction activities resulting in a significant increase in noise or dust, based on baseline levels, to be conducted outside of the nesting season to the extent feasible.

Pre-construction surveys (BIO-5) and biological monitoring (BIO-3) for activities during the nesting season will require the implementation of an initial 300-foot buffer (500 feet for raptors) around active nests and no activities will be allowed within the buffers until the young have fledged from the nest or the nest fails. The prescribed buffers may only be adjusted by a qualified avian biologist in coordination with the USFWS and/or CDFW based on existing conditions around the nest, planned construction activities, tolerance of the species, and other pertinent factors.

L117-13 The commenter brought up concerns related to impacts of the Project on special status bat species and recommends additional surveys and mitigation measures. The Biological Resources Technical Report prepared for the Project did assess the potential for special-status bat species to occur in the BSA. All but one species, western mastiff bat (*Eumops perotis californicus*), was determined to have a low potential of occurrence due to habitat suitability and known occurrences in the region; western mastiff bat was determined to have a moderate potential for occurrence.

The gas and water pipelines will be constructed such that they can avoid the need to remove native or non-native trees that could support bat species. There are several non-native pepper trees along the southern edge of the proposed Project site that may require removal; Project construction activities will avoid tree removal to the extent feasible. At a minimum there will be construction activities within the general vicinity of trees that may have potential to support bat species. Therefore, the additional measures below will be incorporated into the FEIR to mitigate for potential direct and indirect impacts to bat species.

BIO-7A Conduct pre-construction maternity colony or hibernaculum surveys for sensitive bats.

No more than 15 days prior to Project construction activities near trees, or which involve removal of trees or other structures, the City shall retain a qualified biologist who has a CDFW collection permit and a Memorandum of Understanding with CDFW allowing the biologist to handle bats. That biologist shall conduct pre-construction

surveys for sensitive bats. Surveys shall also be conducted during the maternity season (1 March to 30 September) within 100 feet of Project activities.

If active maternity roosts or hibernacula are found, the structure, tree or tower occupied by the roost shall be avoided (i.e., not removed), if feasible; work shall not occur within 100 feet of or directly under or adjacent to an active roost and work shall not occur between 30 minutes before sunset and 30 minutes after sunrise. If avoidance of the maternity roost is not feasible, the biologist shall survey (through the use of radio telemetry or other CDFW methods) for nearby alternative bat maternity colony sites. If the biologist determines in consultation with the CDFG that there are alternative roost sites used by the maternity colony and young are not present then no further action is required, and it will not be necessary to provide alternate roosting habitat. If there are no alternative roosts sites used by the maternity colony, BIO-7B is required. If no active roosts are found, then no further action is required. If active maternity roosts are absent, but a hibernaculum (i.e., a non-maternity roost) is present, then BIO-7B is not necessary, but BIO-7C is required.

BIO-7B Provide substitute roosting habitat for bats.

If a maternity roost will be impacted by the Project, and no alternative maternity roosts are in use near the site, substitute roosting habitat for the maternity colony shall be provided on, or in close proximity to, the Project site no less than three months prior to the eviction of the colony. Alternative roost sites will be constructed in accordance with the specific bat requirements in coordination with CDFW. By making the roosting habitat available prior to eviction (BIO-7C), the colony will have a better chance of finding and using the roost. Alternative roost sites must be of comparable size and proximal in location to the impacted colony. The CDFW shall also be notified of any hibernacula or active nurseries within the construction zone.

If construction of alternative roost sites is required, the biologist shall provide a written report, documenting the required coordination with CDFW as well as the location of roost sites. This report shall be provided to CDFW.

BIO-7C Exclude bats prior to eviction from roosts.

If non-breeding bat hibernacula are found (for the duration of construction activities) in structures or trees scheduled to be removed, the individuals shall be safely evicted, under the direction of a qualified biologist, by opening the roosting area to allow airflow through the cavity or other means determined appropriate by the bat biologist (e.g., installation of one-way doors). In situations requiring one-way doors, a minimum of one week shall pass after doors are installed and temperatures should be sufficiently warm for bats to exit the roost because bats do not typically leave their roost daily during winter months in southern coastal California. This action should allow all bats to leave during the course of one week. Roosts that need to be removed



in situations where, in the judgment of the qualified biologist, the use of one-way doors is not necessary shall first be disturbed by various means at the direction of the bat biologist at dusk to allow bats to escape during the darker hours, and the roost tree shall be removed or the grading shall occur the next day (i.e., there shall be no less or more than one night between initial disturbance and the grading or tree removal).

If an active maternity roost is located in an area to be impacted by the Project, and alternative roosting habitat is available, the demolition of the roost site must commence before maternity colonies form (i.e., prior to March 1st) or after young are flying (i.e., after July 31st) using the exclusion techniques described above.

L117-14 The commenter recommends the final environmental document provide a measure to protect native vegetation communities adjacent to areas of permanent impacts that may need to be routinely cleared of brush to maintain sufficient fire clearance requirements. See Topical Response No. 9. The impact acreages reported in the Draft EIR assume permanent impacts within the entirety of the fire clearance areas associated with the Project site. Mitigation Measure BIO-~~7~~8 requires compensatory mitigation for impacts to native communities. It is important to note that impacts are assumed permanent whether areas will be cleared, or vegetation is just trimmed or pruned. The City notes the recommendation for delineation of the clearance boundaries and will consider options to demarcate the outer boundaries that is wildlife friendly (e.g., wildlife friendly fencing, stakes, etc.); See updated Mitigation Measure BIO-~~7~~8 in Response 117-7.

L117-15 The commenter recommends the Project consider alternative designs to alleviate the need to grade native habitat. The Project considered multiple alternatives for locating Project components to minimize impacts to native habitats to the extent feasible. This included placing the pipelines above ground to minimize grading and placing the Project facilities within predominantly disturbed areas. The majority of native habitat related impacts are a direct result of fire clearance requirements which include a combination of vegetation removal and trimming. Please also refer to Topical Response No. 10.

L117-16 The commenter describes concerns regarding the security fencing and lighting associated with the Project and suggests using wildlife friendly fencing, use low level lighting, and to minimize or eliminate lighting from dawn until dusk. The majority of the Project occurs within previously disturbed lands within the existing landfill. The existing adjacent landfill and open space will still allow for wildlife movement through the area similar to the current site conditions. Wildlife friendly fencing is not proposed due to Project security needs. There are ample opportunities for wildlife movement around the Project site, therefore, the Project is not expected to be an impediment to wildlife movement though the area. The City will take into consideration the recommendations on low level lighting and minimized lighting from the period between dusk and dawn.

L117-17 The Project does not propose the installation of any landscaping. Any vegetation installed would be for post-construction restoration, which would include native species only.

L117-18 The comment is a general statement noting that the proposed Project would have an impact on fish and/or wildlife, and that filing fees should be assessment and be payable upon filing of the Notice of Determination by the City of Glendale to help defray the cost of environmental review by CDFW. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L117-19 The commenter states that they appreciate the opportunity to comment on the Project to assist the City of Glendale in adequately analyzing and minimizing/mitigating impacts to biological resources. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L117-A Attachment A: Draft Mitigation and Monitoring Reporting Plan (MMRP), of the CDFW comment letter, provides recommendations on specific language to be incorporated into a future environmental document for the Project. A final MMRP will reflect recommendations and results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans. Portions of the recommended measures have been incorporated into existing measures. New mitigation measures, regarding bats are included in the responses above.

L118 - Responses to Comments submitted on behalf of Glenoaks Canyon Homeowners Association (GOCHA), received September 29, 2020

L118-1 The comment is a transmittal of an attached comment letter submitted by Amy Minteer of Chatten-Brown, Carstens and Minteer, LLP, on behalf of GOCHA.

L118-2 The comment introduces GOCHA and identifies GOCHA's relationship to the Glendale community. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L118-3 Since April 2018, GWP discontinued combusting LFG in the boilers at the Grayson Power Plant. All LFG produced by the landfill since April 2018 has and is presently being combusted in the existing flare system at the Scholl Canyon Landfill. The Notice of Preparation of the Draft EIR for the Project was noticed on March 21, 2019 and correctly established baseline conditions with flaring of LFG at Scholl Canyon Landfill. Please refer to Topical Responses No. 1, 2, 5, 9, and 10. Please also refer to Response L110-15.

L118-4 Please refer to Topical Responses No. 1 and 5. The commenter has the baseline scenario reversed when the commenter states that "the EIR must identify the future use so that it can adequately address the aesthetic and recreational impacts of the Project constructing an industrial use next to a recreational area." The existing permitted use is "industrial" e.g., land fill operations which include the required and SCAQMD permitted

methane capture and combustion flaring system. The Project with be entirely constructed within the existing Scholl Canyon Landfill area and is not “next to a recreational area.” While it is reasonably foreseeable based on the existing Joint Powers Agreement between the City, County and Los Angeles Sanitation District, that post-closure conversion of Scholl Canyon Landfill into a recreation area will occur, the JPA anticipates the future Scholl Canyon Landfill will include on-going required LFG capture and related facilities and roads; the Project is part of this process. It is unknown when the future closure and conversion of Scholl Canyon Landfill into a recreation area will occur, what improvements or facilities will be contained in that recreation area, and when it would be completed. Nevertheless, the City has analyzed a conservative scenario for post-closure recreational development that is anticipated by the JPA. See Topical Responses No. 5 and 8.

The commenter’s statement that the Draft EIR fails to disclose that the flares for LFG would need to operate simultaneously with the Project is incorrect. Please refer to Topical Response No. 5.

L118-5 Please refer to Topical Responses No. 2 and 10. The commenter contends the City selected a narrow view of the Project which, pursuant to the two court cases cited by the commenter, the commenter believes was done as a “launching pad for a vastly wider proposal”, yet the commenter does not identify what that vastly wider proposal might be; the comment is opinion not supported by facts or evidence.

With respect to the commenter’s contention that the Project and the Grayson Project are interrelated and should therefore be analyzed together because both projects generate power does not connect the Projects from a CEQA perspective.

The Grayson EIR Project Description recognizes that the existing LFG pipeline (no longer in use since April 2018) physically connected the Scholl Canyon Landfill to Grayson Power Plant because LFG was previously burned at Grayson. See Topical Response No. 2 which discusses the relationship between the Grayson Repowering Project and the Biogas Project. The Commenter’s reference to the currently closed and soon to be permanently decommissioned pipeline does not establish that the Grayson Repowering project and Biogas Renewable Generation Project are a single project. The Grayson Repowering Project is evaluated as a related project in the cumulative impact analysis of the Biogas Renewable Generation Project Draft EIR.

To be clear, CEQA Guidelines §15126 states that the project description must include all relevant parts of a project, including future expansion or later phases of the project that will foreseeably result from project approval. *Laurel Heights Improvement Assn. v Regents of the University of California*, (1988) 47 Cal.3d 376, establishes a two-pronged test for determining what constitutes the whole of the project. First, is whether the activities are reasonably foreseeable consequence of the initial project, and second, is whether future expansion/action will be significant (change the scope or nature of the

initial project or its environmental effect). The commenter provides no substantial evidence to support the contention that the Project is a reasonably foreseeable consequence of Grayson's repowering or that the Project is a future expansion of Grayson or of any other project. (See Topical Responses No. 1 and 2)

In *Aptos Council v County of Santa Cruz* (2017) 10 Cal.App.5th 266, 281, the court found that possible future expansion or other action related to a project that is not a reasonably foreseeable consequence of the project need not be included in an EIR's project description, especially where such activities will operate independently of one another and can be implemented separately. In that case the county approved several revisions to its zoning ordinances, but they were not considered a single project because ordinances serve different purposes, operate independently of one another, and can be implemented separately, as is the case with Grayson and the Project. See also, *Paulek v Department of Water Resources* (2014) 231 Cal.App.4th 35, 46.)

The fact is that LFG was flared at Scholl Canyon Landfill prior to SCAQMD prohibiting burning LFG at Grayson, and LFG will continue to be flared at Scholl Canyon Landfill, during Project construction or maintenance periods as a backup system to destroy methane and other LFGs. Flaring at Scholl Canyon Landfill would occur regardless of whether Grayson is repowered or the Project is built. The Project is not a reasonably foreseeable consequence of Grayson repowering since LFG flaring pre-existed the Grayson repowering project and flaring already handles the LFG produced at Scholl Canyon Landfill in accordance with an existing SCAQMD permit to operate. However, flaring does not beneficially employ the combustion process for power generation or for use in the Project or any of its feasible alternatives.

L118-6 The commenter supposition indirectly encourages expansion of the landfill is based entirely on speculation. Please refer to Topical Response No. 1.

L118-7 Please refer to Topical Response No. 5. The choice of Project baseline is not a manipulation as alleged by the Commenter. The purpose of the Project is to burn the same LFG that was previously burned at Grayson and which is currently being flared at Scholl Canyon Landfill – there is only one LFG source. Both of those baseline emission conditions (Grayson and flaring) will, for the most part except for nominal flaring) be eliminated through project implementation. The prior Project MND conservatively analyzed AQ and GHG Project impacts while LFG was burned at Grayson, and this current Project Draft EIR analyzed the Project AQ and GHG impacts while LFG was 100 percent being burned at the Scholl Canyon Landfill. The data shows that in both instances the Project AQ and GHG impacts are less than significant. It is not accurate to "add" Project AQ and GHG impacts to either the burning LFG at Grayson or flaring LFG at Scholl Canyon Landfill because not only is that factually inaccurate, because the same LFG cannot be burning at both locations at the same time. Accordingly, to do so would artificially increase, perhaps doubles the actual emissions expected to occur with Project implementation. Topical Response No. 5 includes data from the pre-April 2018

conditions, which reflects burning LFG at Grayson. However, based on the fact that the Project is designed to significantly reduce the need for flaring at Scholl Canyon Landfill and eliminates burning LFG at Grayson, whether a pre- or post-April 2018 baseline is used would not change the Project impacts on AQ or GHG emissions. Accordingly, using the NOP issuance date as the baseline is appropriate. Further, because the thresholds of significance are concentration based, using the Draft EIR baseline is also appropriate and is more conservative because the Project emissions are added to the existing elevated ambient air quality concentrations from LFG flaring emissions at Scholl Canyon Landfill. When compared to pre-April 2018 conditions (virtually no flaring at Scholl Canyon Landfill), the post-2018 conditions would more likely reflect threshold exceedances, and the data shows AQ and GHG analysis (Project plus flaring) does not exceed applicable thresholds and/or was shown not to exceed an ambient air quality standard through dispersion modeling.

L118-8 Please refer to Topical Response No. 5.

L118-9 Please refer to Topical Response No. 5.

L118-10 Please refer to Topical Response No. 5 and Response L110-13.

L118-11 Please refer to Topical Response No. 5 and Response L118-7.

L118-12 Please refer to Topical Response No. 9.

L118-13 The Project does not propose habitable structures. Vegetation clearance requirements, potential impact radius of the natural gas pipeline, and design consideration such as placing the engines in engineered enclosures with fire protection systems are facts supporting a low risk of wildfire. Please refer to Topical Responses No. 7, 8, and 9.

L118-14 Onsite access roads have been designed in accordance with and have been approved by the Glendale Fire Department. The Project does not propose or require the construction or maintenance of any offsite emergency access roadway. Please refer to Topical Responses No. 8 and 9.

L118-15 The existing overhead electrical lines are part of the baseline conditions for wildfire risk. The Project does not include the installation of new overhead electrical lines. The Project would be designed, operated, and maintained in accordance with applicable building code requirements, including seismic safety. Please refer to Topical Responses No. 6, 7, and 9.

L118-16 Please refer to Topical Response No. 6 and Response L110-A-43.

L118-17 The EIR analyzed cumulative Project impacts. See Sections 4.1.5, 4.2.5, 4.3.5, 4.4.5, 4.5.5, 4.6.5, 4.7.5, 4.8.5, 4.9.5, 4.10.5, 4.11.5, 4.12.5, 4.13.5, and 4.14.5 for the cumulative impacts analysis.



L118-18 LFG is being flared at Scholl Canyon Landfill in accordance with the conditions of an existing SCAQMD Permit to Operate, which permits full time flaring already and the permit was issued following a CEQA analysis . The LFG collection system and existing flares are part of the baseline environmental conditions considered in the Draft EIR. Please also refer to Topical Response No. 5. No new “mitigation” measures are required in order to use the existing flaring permit. Please also refer to Topical Response No. 9 and Response L118-19.

L118-19 If allowed during Project operation, smoking would be restricted to a designated smoking area within the site. The designated smoking area would be operated and maintained with applicable City and code requirements for signage and appropriate disposal receptacles. Mitigation measures would be enforced through implementation of a CEQA required Mitigation Measure Monitoring and Reporting Plan. The Project would not have a significant wildfire impacts during operation due to project design features such as placing the reciprocating internal combustion engine generators in enclosures equipped with an inert gas fire suppressions system, remote monitoring and control systems, and onsite fire water protection tank. Please refer to Topical Responses No. 6 and 9.

L118-20 The Draft EIR recognizes the Project’s location within a high fire hazard area and the meteorological conditions including high winds that contribute to the high fire hazard area designation. The Project considers these baseline conditions when evaluating potential wildfire impacts and would be required to comply with applicable fire protection code requirements applicable to high fire hazard areas. Please refer to Topical Responses No. 7 and 9.

L118-21 The comment contains generalizes statements about the adequacy of the Draft EIR’s alternatives analysis, which is contained in Section 5.0, Alternatives, of the Draft EIR. In fact, the Draft EIR analyses and considers Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate power. The Project objectives are not so narrowly drawn as to preclude consideration of reasonable, feasible alternatives.

L118-22 See Response tL118-21. The comment here presupposes the Draft EIR analysis is not adequate and therefore the alternatives analysis must be revised and the Draft EIR recirculated. The comment also includes general citations to CEQA case law pertaining to alternatives and mitigation, and refers back to the SWAPE letter L-110-B. Please see Topical Response No. 5 that shows emissions of dioxins associated with the Project would not result in significant adverse health effects. The proposed LFG pre-treatment/conditioning process, high operating temperatures of the reciprocating internal

combustion engines, and emissions control system would be effective in removing and/or destroying dioxins if present in the LFG.. Please also refer to Topical Response No. 10.

L118-23 The comment asserts that the Draft EIR fails to include the necessary comparative analysis of Project Alternatives in order to allow for necessary comparison. Please refer to Section 5.6.5 of the Draft EIR for the comparative analysis of the Project Alternatives. The comment asserts that a comparative analysis of the Project is alternatives is not adequate but does not cite to any authority or show how such comparative analysis is in fact inadequate. The comment also criticizes the Draft EIR inclusion of a list of Operational or Planned LFG Projects in California and is included for informational purposes and are not themselves considered "alternatives" to the proposed Project; therefore, the information provided in the list need not be any more detail.

According to CEB's 2021 Practice Under the California Environmental Quality Act (Kostka, Zischke)(herein referred to as the "CEQA Practice Guide"), Section 15.35, "An EIR must evaluate the comparative merits of the alternatives identified in an EIR." 14 Cal Code Regs §15126.6(a). There are several methods for analyzing the alternatives in an EIR, and the courts have not favored any particular method. Most often, the analysis of the alternatives is set forth in a separate section of the EIR containing a discussion comparing the key characteristics of each alternative and the project. Sometimes the analysis includes an impact-by-impact comparison of the alternatives and the project. A discussion of alternatives may also be set forth in each topical section of the EIR rather than in a separate section.

The level of analysis of alternatives is subject to a rule of reason, as with the range of alternatives that must be discussed. *Laurel Heights Improvement Ass'n v Regents of Univ. of Cal.* (1988) 47 C3d 376, 406. The discussion need not be exhaustive and a crystal ball inquiry is not required. *Sierra Club v City of Orange* (2008) 163 CA4th 523, 547; *Foundation for San Francisco's Architectural Heritage v City & County of San Francisco* (1980) 106 CA3d 893, 910. The agency need make only an objective, good faith effort to compare the project with the alternatives. The evaluation is necessarily limited by what is realistically possible given limitations on time, energy, and funds. *Residents Ad Hoc Stadium Comm. v Board of Trustees* (1979) 89 CA3d 274, 286."

Further, Section 15.36 of the Practice Guide states, "The significant adverse environmental effects of each alternative must be discussed, *but in less detail than is required for the project's effects.* 14 Cal Code Regs §15126.6(d). *A matrix showing the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison of alternatives with the proposed project*. 14 Cal Code Regs §15126.6(d). See *Sierra Club v City of Orange* (2008) 163 CA4th 523, 547." (Emphasis added)

Accordingly, a matrix or chart which provides a summary comparison between the relative impacts of the Project and the Project Alternatives is an adequate method of

comparative analysis because it is objective, prepared in good faith, and realistic given the reasonable range of alternatives to the Project.

L118-24 See Response L118-24 above. The comment states the Draft EIR fails to provide evidentiary support for the comparative analysis of the Project and Alternatives, however, the comparison chart on pages 5.17 and 5.18 of the Draft EIR is based on the analysis of each Alternative contained in the Draft EIR, which need not be as detailed as the Project analysis; and the comment does not point out what evidence is in fact lacking. The "magnitude" of the impact reduction of an Alternative compared to the Project need not be more detailed than reflecting whether the level of impact of an Alternative is greater or lesser compared to the Project. Please also refer to Topical Response No. 10.

L118-25 The comment claims that Alternative 4 and Alternative 2 are feasible, but the Draft EIR lacks the necessary quantitative analysis to provide the public and decision makers with sufficient information. Please refer to Topical Response No. 10.

L118-26 The comment presents and opinion that the Draft EIR is fatally flawed and must be recirculated. The commenter's opinion is included for consideration by the decision makers.

L118-27 The commenter presents a list of attachments provided with their comment letter. See Topical Responses No. 1 and 5 with respect to Attachment 1 which allegedly consists of a list of the Scholl Canyon Landfill gas flow rates. This list is not attributed to any verifiable source, and therefore cannot be considered substantial evidence in support of the comment. Attachment 2 consists of the commenter's 2018 comments on an entirely separate project (See Topical Response No. 2). Attachment 3 consists of the commenter's 2017 three-page comment letter on the Biogas Project MND wherein the commenter posits an opinion that the Project be analyzed in an EIR; the City prepared an EIR for the Project, and the City has responded to the commenter's comments on the Draft EIR. Attachment 4 consists of excerpts for the Scholl Canyon Landfill Expansion Project EIR; these excerpts are not relevant to the proposed Project because the Scholl Canyon Landfill Expansion Project was not approved, was officially abandoned, and that 2014 Project EIR is outdated. (See Topical Response No. 1).

L119 - Responses to Comments from Jackie Gish, received September 29, 2020

L119-1 The comment introduces attached detailed comments on the Draft EIR.

L119-2 The comment explains the commenter's relationship to the Glendale community.

L119-3 Glenoaks Canyon Residents question the project objective, why there was no statement of picking the best project from the point of view of health and safety of the residents and environmental, additionally, comment a possibility of LFG burning may not be classified as "renewable energy" in the future.



California has established a goal of relying entirely on zero-emission energy sources for its electricity by the year 2045. The bill specifically requires that 50 percent of California's electricity to be powered by renewable resources by 2025 and 60 percent by 2030, while calling for a "bold path" toward 100 percent zero-carbon electricity by 2045. Glendale is working toward meeting these renewables requirements. The Biogas Project is one of the ways the City proposes to meet these requirements.

Section 5.6.6 (Identification of the Environmentally Superior Alternative), discusses the environmentally Superior Alternative, as required by Section 15126.6 of the State CEQA Guidelines requires that an “environmentally superior” alternative be selected among the alternatives that are evaluated in the EIR. In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts.

The Project would serve a benefit from utilizing LFG that would be otherwise wasted to generate electricity even if renewable energy regulations change in the future. Please also refer to Topical Responses No. 5, 6, and 9.

L119-4 Please refer to Topical Response No. 5.

L119-5 LFG is permitted by SCAQMD to be combusted in flares at Scholl Canyon Landfill and is considered an existing baseline condition for the Project EIR. Los Angeles County Sanitation District plans to replace the existing flares with new flares. If the Project is implemented, LFG not combusted in the reciprocating internal combustion engine generators would be combusted in the exiting flares and then the new flares once the flare replacement is completed by Los Angele County Sanitation District. The Project’s potential air quality and health impacts were conservatively analyzed in the Project’s EIR which assumed use of the existing flares which have higher emissions than the replacement flares proposed by Los Angeles County Sanitation District. Please also refer to Topical Response No. 5.

L119-6 Please refer to Response L110-11.

L119-7 Figure 2.3-3 of the EIR provides the layout of the Proposed Project. Artist’s concepts were not prepared by the City and potential impacts of the Project would be comparable regardless of adjacent landfill activity/elevation.

L119-8 Please refer to Topical Response No. 1.

L119-9 The City selected the proposed engines because they are efficient, capable of combusting the LFG to generate electricity, and the capacity/number of units is scalable as the available volume of LFG decreases over time.

L119-10 Engines are projected to run both during the day and night. The number of engine starts/stops and maintenance needs used in the EIR are conservative. The EIR analyzes

potential environmental impacts of combusting all of the LFG available. Please also refer to Topical Response No. 5.

L119-11 Please refer to Topical Response No. 5.

L119-12 The natural gas is needed to supplement combustion in the engines during engine startup and/or when LFG methane content periodically decreases as decomposition of landfill materials vary over time.

L119-13 The City selected the proposed engines because they are efficient, capable of combusting the LFG to generate electricity, and the capacity/number of units is scalable as the available volume of LFG decreases over time. Please also refer to Topical Responses No. 1 and 5.

L119-14 Any waste products would be handled, transported, and disposed of in compliance with all applicable federal, state, and local laws, regulations, and guidelines.

L119-15 Please refer to Topical Response No. 4.

L119-16 Please refer to Topical Response No. 5.

L119-17 to L119-34 The commenter reiterates similar comments (L119-17 through L119-34) previously submitted by the Glenoaks Canyon Scholl Canyon Landfill Work Group as Attachment A to comment letter L110, submitted by GOCHA on September 28, 2020. Please refer to responses to comments L110-A-7 through L110-A-101, received September 28, 2020. Please also refer to Topical Response No. 10.

L119-35 The commenter provides a summary of comments and concerns expressed throughout the comment letter. Please refer to responses to comments L119-1 through L119-34. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 10.

L119-36 Page 4.164 of the Final EIR has been revised to include the reference of "million" MWhr in regard to the City's electrical load obligation. Page 4.212 of the Draft EIR correctly references the equation for Potential Impact Radius defined in 49 CFR § 192.903 which is used by U.S. Department of Transportation, Pipeline Management and Hazardous Materials Administration for regulatory compliance related to natural gas pipeline integrity management. Please also refer to Topical Response No. 5.

L120 - Responses to Comments from Justin King, received September 29, 2020

L120-1 The comment expresses the commenter's opinion of (or preference about) the Project. Please refer to Topical Response No. 1.



L120-2 Please refer to Topical Response No. 1 and Response L92-1.

L120-3 Please refer to Topical Response No. 1.

L120-4 Please refer to Response L110-A-49.

L120-5 Specifications for secondary containment for lube oil, liquid wastes, and hazardous wastes would be confirmed during final engineering design. Containment utilized would meet appliable code requirements. Stormwater collected in secondary containment would be removed by vacuum truck or portable pump.

L120-6 Hazardous waste, if and when present, would be stored in a single accumulation site within the 2.2-acre power generation facility. The potential environmental impacts evaluated in the Draft EIR assume the waste accumulation site could be located anywhere within the 2.2-acre power generation facility.

L120-7 The lube oil and liquid wastes would be located within the 2.2-acre power generation facility. While the final location would be confirmed during final engineering design, the potential environmental impacts evaluated in the Draft EIR assume the lube oil and liquid wastes could be located anywhere within the 2.2-acre power generation facility.

L120-8 The natural gas pipeline is a proposed component of the Project and its potential environmental impacts are evaluated throughout the Draft EIR. The discussion of the natural gas pipeline and environmental impacts analysis of that pipeline has been added to Section 4.13 of the Draft EIR.

L120-9 Waste impurities removed from the condensate would be stored in a single accumulation site within the 2.2-acre power generation facility. The potential environmental impacts evaluated in the Draft EIR assume the waste accumulation site could be located anywhere within the 2.2-acre power generation facility. Please also refer to Response L120-5.

L120-10 Please refer to Responses L120-5, L120-6, L120-7, and L120-9.

L120-11 The air monitoring stations used in support of the dispersion modeling are consistent with SCAQMD guidance. No additional baseline air monitoring is proposed or required as part of the Project. Please refer to Topical Response No. 5.

L120-12 Please refer to Response L110-A-44.

L120-13 Please refer to Response L110-A-45.

L120-14 Please refer to Response L110-A-43.

L120-15 Please refer to Response L110-A-44.

L121 - Responses to Comments from Miri Hindes, received September 29, 2020



L121-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L121-2 Please refer to Topical Response No. 9.

L121-3 Please refer to Responses L110-11 and L110-15 and Topical Response No. 10.

L121-4 Please refer to Topical Response No. 1.

L121-5 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L122 - Responses to Comments from Scott Freudenberg, received September 29, 2020

L122-1 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. The Project is proposed to be located within the existing boundaries of the Scholl Canyon Landfill which naturally produces methane and other LFGs. The SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in existing flares at the Scholl Canyon Landfill pursuant to an existing SCAQMD permit. Rather than continuing to flare the LFG and lose the energy produced by the required combustion, the proposed Project seeks to capture and beneficially use the LFG for to generate electricity and thereby assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation. Please also refer to Topical Responses No. 5, and 9.

L123 - Responses to Comments from Shanah Blevins, received September 29, 2020

L123-1 The comment expresses the commenter's opinion of (or preference about) the Project. Please refer to Topical Responses No. 5, 7, and 9.

L124 - Responses to Comments from Spencer Wright, received September 29, 2020

L124-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L124-2 Please refer to Topical Responses No. 4 through 9.

L124-3 Please refer to Topical Responses No. 1 and 10.

L124-4 SCAQMD and federal regulations mandate that LFG must either be flared or captured and converted to energy. The flaring of LFG at Scholl Canyon Landfill is permitted under existing SCAQMD permits. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of project alternatives required for an EIR under the CEQA Guidelines and see Topical Response No. 10. The alternatives selected for analysis represent a reasonable range that meet the project objectives, reduce project impacts is some areas, and will assist in informed decision-making. Please also refer to Responses L110-11 and L110-15. The commenter's opinion of (or preference about) the Project is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L125 - Responses to Comments from Bonnie Voland, received September 30, 2020

L125-1 The commenter identifies her relationship to Glendale. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L125-2 Please refer to Topical Responses No. 5 through 9.

L125-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L126 - Responses to Comments from Chris Hulen, received September 30, 2020

L126-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L127 - Responses to Comments from East Area Progressive Democrats, received September 30, 2020

L127-1 The commenter introduces the East Area Progressive Democrats' (EAPD) letter of opposition to the Project. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L127-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. Please refer to Responses L110-11 and L110-15. The commenter's

statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. See also Topical Response No. 10.

L127-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment claims the Draft EIR is defective but does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L127-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L127-5 The Project and Draft EIR are not premised on the functionality or suitability of the existing pipeline between Scholl Canyon Landfill and Grayson Power Plant. Please refer to Section 5.6.4 of the Draft EIR for a discussion of a Project alternative that includes re-use of the existing pipeline between Scholl Canyon Landfill and Grayson Power Plant. See also Topical Responses No. 2 and 10.

L127-6 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 2.

L127-7 Please refer to Response L127-6.

L127-8 Please refer to Topical Responses No. 7 and 9.

L127-9 The comment expresses support of Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 2 and No. 10.

L127-10 Please refer to Topical Response No. 1.

L127-11 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L128 - Responses to Comments from Edmund H. Lew, received September 30, 2020

L128-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. Please also refer to Topical Response No. 5.

L128-2 The comment expresses support of Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L129 - Responses to Comments from Eileen Hatrick, received September 30, 2020

L129-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L129-2 Please refer to Topical Response No. 5. Please also refer to Section 5.6.4 of the Draft EIR for a discussion of a Project alternative that includes re-use of the existing pipeline between Scholl Canyon Landfill and Grayson Power Plant. See also Topical Responses No. 2 and 10.

L129-3 Please refer to Response L129-2.

L129-4 Please refer to Topical Responses No. 5, 7, and 9.

L130 - Responses to Comments from Gustavo Moreno, received September 30, 2020

L130-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 5.

L130-2 The Los Angeles River, Eagle Rock Reservoir, and Hillmont Pump and Eagle Rock Chlorination Station are located approximately 4.25 miles southwest, ½ mile south, and 0.6-mile south of the Project site, respectively. The comment does not specify a specific water quality concern with respect to these features relevant to the Project's potential environmental impacts pursuant with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L130-3 In March 2020, as part of a series of emergency measures in response to the COVID-19 pandemic, Governor Newsom signed Executive Order N-29-20, allowing local and state agencies to hold virtual meetings via teleconference and to make meetings accessible electronically notwithstanding the open meeting requirements in the Bagley-Keene Act and the Brown Act. These provisions were due to expire on June 15, 2020.

On June 2, 2021, in response to a written request by a coalition of local government agencies, the Governor announced that N-29-20 will not terminate on June 15, and that state and local agencies can continue to conduct virtual public meetings as needed. The Governor did not set a new expiration date for N-29-20 and committed to provide advance notice before rescinding the order to provide the agencies the time needed to meet statutory and logistical requirements.

Under the Governor's announcement, state and local agencies may continue to hold meetings in California via teleconferencing and allow members of the public to observe and address the meeting by telephone or on the internet. All requirements of the Bagley-Keene Act and Brown Act requiring the physical presence of agency officials, staff or the public at public meetings remain suspended.

L131 - Responses to Comments from Gustavo Moreno, received September 30, 2020

L131-1 The comment indicates that the zip code provided as part of the address for mail in comments was incorrect on the website and that this error may have affected mail in comments. Mail in comments that were addressed to the referenced inaccurate zip code were received because the zip code included an extended ZIP+4 code that designated a more specific location. The "4386" extender is correct.

L132 - Responses to Comments from Jack Walworth and Dorothy Low, received September 30, 2020

L132-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L132-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L132-3 Please refer to Topical Responses No. 1, 5, 6, and 9.

L132-4 The Project does include a change in zoning.

L132-5 Please refer to Topical Response No. 5.

L132-6 Please refer to Response L110-15.

L132-7 Please refer to Response L110-15.

L133 - Responses to Comments from Jennifer Wright, received September 30, 2020

L133-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.

L133-2 The commenter reiterates comments submitted by the Coalition for Scholl Landfill Alternatives (CSLA) on September 23, 2020. Please refer to Response L84 from CSLA, received September 23, 2020. Please also refer to Topical Responses No. 1, 2, 5, 6, and 9.

L133-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L134 - Responses to Comments Judy Gate, received September 30, 2020

L134 The comments within this letter directly reiterate comments previously submitted by Marwan and Amy Ataya on September 6, 2020. Please refer to responses to comments of L40 from Marwan and Amy Ataya, received September 6, 2020.

L135 - Responses to Comments from Koreen A. Cea, received September 30, 2020

L135-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L135-2 Please refer to Topical Responses No. 7 and 9.

L135-3 Please refer to Topical Response No. 7.

L135-4 Please refer to Response L127-5.

L135-5 Please refer to Topical Responses No. 1 and 10.

L135-6 Please refer to Topical Response No. 1.

L135-7 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's

statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 7 and 9.

L136 - Responses to Comments from LA River Communities for Environmental Equity, received September 30, 2020

L136-1 Please refer to Topical Response No. 5.

L136-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L136-3 Please refer to Response L127-5.

L136-4 Please refer to Topical Responses No. 1, 5, and 7.

L136-5 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 7 and 9.

L137 - Responses to Comments from Linda Vista-Annandale Association, received September 30, 2020

L137-1 The comment is a transmittal of an attached comment letter from the Linda Vista-Annandale Association.

L137-2 The comment introduces the Linda Vista-Annandale neighborhood and its relationship to Scholl Canyon Landfill.

L137-3 Sensitive residential receptors closest to the Project site have the potential to be exposed to the highest magnitude of environmental impacts including but not limited to air quality and noise. The Draft EIR analyzes potential environmental impacts to the nearest sensitive residential receptors. Residential receptors located further than those quantitatively analyzed in the Draft EIR would be subjected to similar or less potential environmental impacts. Please refer to Topical Responses No. 5 and 8.

L137-4 Please refer to Topical Response No. 5.

L137-5 Please refer to Topical Response No. 4.

L137-6 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L138 - Responses to Comments from Liuba Ruiz, received September 30, 2020

L138-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L138-2 Please refer to Topical Responses No. 1, 5, 7, and 9.

L138-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L139 - Responses to Comments from Los Angeles County Public Works, received September 30, 2020

L139-1 The comment is a transmittal of an attached comment letter submitted by the Los Angeles County Public Works.

L139-2 The comment provides a background of the Project and CEQA requirements.

L139-3 The comment provides a background of the Project. Please refer to Topical Response No. 1.

L139-4 Please refer to Topical Responses No. 7 and 9.

L139-5 Please refer to Topical Responses No. 5 and 8. The Project's air quality and greenhouse gas emissions impacts would be less than significant. The noted regulation related to CARB requiring manufacturer's sales of an increasing percentage of zero-emissions heavy duty trucks is not applicable to the Project's determination of potential environmental impacts. Further, the Project does not include heavy-duty truck use beyond which occurs during existing facility operation and maintenance. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L139-6 Please refer to Topical Response No. 8.



L139-7 Please refer to Topical Response No. 10. SB 1383, the “Short-Lived Climate Pollutants (SLCP): Organic Waste Methane Emissions Reductions” was signed into law in September 2016. SB 1383 establishes methane emissions reduction targets in a statewide effort to reduce emissions of short-lived climate pollutants (SLCP) in various sectors of California's economy. SB 1383 establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The law grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that not less than 20 percent of currently disposed edible food is recovered for human consumption by 2025. The City of Glendale, like all other cities and counties in California are required to comply with these regulatory requirements which do not eliminate the disposal of organic wastes into landfills but are aimed at reducing disposal. At present, CalRecycle, the League of California Cities and other entities across the state are working to find or create funding sources to assist cities and counties to comply with the unfunded mandates of this legislation. Cities and counties are seeking ways to avoid increases customer waste disposal rates and to provide education, methods, materials, personnel and administration to achieve SB 1383’s targets. SB 619 as currently proposed is seeking to delay SB 1383’s implementation in order get the necessary funding and infrastructure in place to comply with SB 1383’s mandates. However, even with the implementation of SB 1383, organic waste will continue to be disposed of within Scholl Canyon Landfill for the foreseeable future and the previously deposited organic waste will continue to degrade for many years, which necessitates the on-going capture and incineration of methane as required by the SCAQMD. Please refer to Topical Responses No. 1 and 5.

L139-8 Combusting LFG greatly reduces odors associated with LFG. Odors from combusting the LFG in the reciprocating internal engine generators, regenerative flare, and existing or new flares would be similar to odors generated under baseline conditions which included 100 percent combustion of LFG in the existing flares. Please also refer to Response L94-24 for a discussion on pipeline decommissioning and potential odors during construction.

L139-9 The comment provides contact information in the event of any questions regarding the comments within the letter.

L140 - Responses to Comments from Matt Bissonnette, received September 30, 2020

L140-1 The comment introduces an attachment that contains comments and contains a general statement about the commenter’s opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter’s statement is included in the Final EIR for the decision-maker’s consideration as part of the City’s deliberations on the Project.

L140-2 Please refer to Topical Response No. 1.

L140-3 Please refer to Topical Response No. 5.

L140-4 Please refer to Topical Response No. 5.

L140-5 Please refer to Topical Responses No. 6, 7, and 9.

L140-6 Please refer to Topical Responses No. 4 and 8.

L140-7 Please refer to Topical Response 10 and Responses L110-11 and L110-15.

L140-8 Please refer to Topical Responses No. 1, 5, and 7.

L141 - Responses to Comments from Miri Hindes, received September 30, 2020

L141-1 This is a duplicate comment letter received separately from the original submission. Please see responses to comments to L121 from Miri Hindes, received September 29, 2020. Please also refer to Topical Response No. 10.

L142 - Responses to Comments from Mitchell Rubinstein, received September 30, 2020

L142-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L142-2 Please refer to Topical Response No. 9.

L142-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L143 - Responses to Comments from Councilmember-elect Kevin de León, received September 30, 2020

L143-1 The comment is an introduction to the comment letter and contains a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L143-2 Please refer to Topical Responses No. 5 and 9.

L143-3 Please refer to Topical Responses No. 1, 5, and 8.

L143-4 Please refer to Topical Response No. 1.

L143-5 The comment does not identify how the proposed Project "violates the intent of [Senate Bill 100] the law." The comment does not state that the proposed Project violates the letter of SB 100. In fact, the Project does the opposite of what is alleged in this comment.

On September 10, 2018, Governor Jerry Brown signed SB 100 into law. SB 100 is an environmental measure that sets a commitment to establish 100 percent clean energy in California by 2045, speeding up the state's timeline for moving to carbon-free power sources. Under the law, 60 percent of the power purchased by California utilities must come from renewable sources by 2030. California has a multi-hundred-page handbook providing guidance on what is considered renewable power resources – everything from solar to *biogas* to wave and tidal current energy. The additional 40 percent of the power California's utilities will deliver to residents, businesses, and government agencies must come from 'zero-carbon' sources. SB 100 requires all retail electricity to be carbon-free by 2045. According to the U.S. Energy Information Administration, Biogas qualifies as a renewable fuel for electricity generation in state renewable portfolio standards. It also qualifies under the U.S. Renewable Fuel Standard Program as an advanced or cellulosic biofuel and under California's Low Carbon Fuel Standard as a feedstock for low carbon fuels. *Nearly all of the biogas now consumed in the United States is produced from anaerobic decomposition and used for electricity generation.* Biogas is a defined renewable energy source recognized by SB 100 renewable portfolio standards and its guidance. The Project is specifically targeted at compliance with California's aggressive clean energy mandate in SB 100 and will help Glendale and the state achieve these goals. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L143-6 Please refer to Topical Responses No. 1, 5, and 7.

L143-7 Please refer to Topical Response No. 1.

L143-8 Please refer to Topical Responses No. 1 and 5.

L143-9 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also respond to Topical Response No. 4.

L143-10 The comment is a general statement about the commenter's opinion of (or preference about) the Project. Please also refer to Topical Response No. 5. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L144 - Responses to Comments from Patricia, received September 30, 2020

L144-1 The comment introduces comments regarding the Project.

L144-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. Please refer to Topical Responses No. 1-9. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L144-3 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. Please also refer to Topical Responses No. 5 and 7.

L145 - Responses to Comments from Rebecca Addelman, received September 30, 2020

L145-1 This comment is an introduction to attached comments and a general statement about the commenter's concerns for (or preference about) the Project and introduces an attached comment letter. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L145-2 The attached comment letter reiterates comments submitted by Matt Bissonnette on September 30, 2020. Please see responses to comments to L140 from Matt Bissonnette, received September 30, 2020. Please refer also to Topical Response No. 10.

L146 - Responses to Comments from Robinson Wills, received September 30, 2020

L146-1 Please refer to Topical Responses No. 6 and 7.

L147 - Responses to Comments from Sergio Keusayan, received September 30, 2020

L147-1 The commenter directly reiterates comments submitted by Audry Zarokian on September 29, 2020. Please refer to responses to comments of L116 from Audry Zarokian, received September 30, 2020.

L148 - Responses to Comments from South Coast Air Quality Monitoring District (SCAQMD), received September 30, 2020

In response to the SCAQMD comment letter dated September 30, 2020, the facility updated the air quality impact analysis to reflect the updated LFG profile. Based on most recent data, LFG production was estimated to be 6,200 scfm and 135.26 MMBtu/hr, based upon a measured heating value of 363.3 Btu/cf (36 percent methane). Therefore, the LFG will be utilized as follows:

- Four reciprocating internal combustion engines (RICE): 105.36 MMBtu/hr.;

- Regenerative (regen) gas flare: 5 MMBtu/hr.; and
- Flare system (reminder of the LFG): 24.90 MMBtu/hr.

There are no changes made to the assumed fuel consumption for the engines; therefore, there are no updates on the engine analysis. The air quality analysis was updated to reflect the volume of gas to be consumed by the regenerative gas (regen) flare and the flare system.

L148-1 The comment notes submissions of SCAQMD's comments on the Draft EIR.

L148-2 The comment introduces SCAQMD's comments on the Draft EIR.

L148-3 **L148-3, L148-A-4 – CEQA Air Quality and Health Risk Impacts from the Regenerative Gas Flare**

The regen flare will be part of the proposed Project; therefore, air quality and health risk impacts from this equipment were analyzed.

The flare will be utilized to incinerate off-gas from the LFG sulfur and siloxane removal system. The flare is rated at 5 MMBtu/hour and will utilize LFG as its main fuel. Natural gas will be supplied to the flare when the BTU content of the LFG is reduced over time. Since the natural gas supply is expected to be less than 10 percent of total capacity based on the higher heating value of the fuel and natural gas is a cleaner gas than LFG, the emissions inventory and modeling analysis were performed based on 100 percent LFG. The equipment information is summarized in Table 1.

Table 1 – Regenerative Flare Specifications

Description	Specification
Manufacturer:	Perennial Energy (PEI)
Max. Heat Input Rating:	5 MMBtu/hr.
Fuel:	Landfill gas
Stack Height:	28 feet
Stack Diameter:	48 inches
Max. Exhaust Flow Rate:	2,227 scfm (8,310 acfm)
Max. Exhaust Temperature:	1,400 °F

The regen flare is expected to meet the NO_X, CO, and VOC emission standards of Rule 1118.1. These emission standards are 0.025 lbs./MMBtu for NOX, 0.06 lbs./MMBTU for

CO, and 0.038 lbs./MMBtu for VOC. A PM10/2.5 emission factor of 6.1 lbs./MMCF based upon SCAQMD prior engineering evaluation on Los Angeles County Sanitation District permit application number 245157 was used to estimate the PM emissions from the flare. The SO_X emissions were calculated based upon the allowable sulfur content concentration of 60 ppmv for LFG. To estimate the potential emissions, the regen flare is assumed to be operated at 24 hours per day, 7 days per week, and 52 weeks per year. Table 2 summarizes the emission inventory of the regen flare.

Table 2 – Criteria Pollutant Emission Summary

Pollutant	Max. Daily Emissions, lbs./day	Max. Monthly Emissions, lbs./month	30-Day Average Emissions, lbs./day	Annual Emissions, lbs./year
NO_X	3.00	90	3	1,095
CO	7.20	216	7	2,628
VOC	4.56	137	5	1,664
PM10/2.5	2.01	60	2	735
SO_X	3.34	100	3	1,220

Toxic Air Contaminant (TAC) emissions are expected because the regen flare will utilize LFG. Similar to the existing flare system, TAC emissions from the regen flare will reflect emission factors based on LFG samples, SCAQMD AB2588 and USEPA AP-42 default emission factors. Additionally, dioxins and furan compounds emissions were calculated based on the source test conducted on the LFG combustion in the boiler at Grayson power plant. The source test shows octachlorodibenzo-p-dioxin (dioxin and furan compounds) emission factor of 5.33E-10 lbs./mmcf. Table 3 summarizes the TAC emission inventory for the regen flare.

Table 3 – Toxic Air Contaminants Emission Summary

TAC	CAS	Max. Hourly Emissions, lbs./hr.	Annual Emissions, lbs./year
1,1,1 – Trichloroethane	71-55-6	1.99E-06	0.0174
1,1,2,2 – Tetrachloroethane	79-34-5	1.32E-04	1.1599
1,2 – Dibromoethane	106-93-4	5.47E-06	0.0479
1,1 – Dichloroethane	75-34-3	2.74E-06	0.0240
1,1 – Dichloroethene	75-35-4	1.31E-06	0.0115
1,2 – Dichloroethane	107-06-2	7.17E-06	0.0628
1,2 - Dichloropropane	78-87-5	1.45E-05	0.1266

TAC	CAS	Max. Hourly Emissions, lbs./hr.	Annual Emissions, lbs./year
2 – Propanol	67-63-0	2.14E-03	18.7479
Acetonitrile	75-05-8	2.74E-05	0.2404
Acrylonitrile	107-31-1	2.39E-04	2.0909
Benzene	71-43-2	9.49E-05	0.8315
Benzyl chloride	100-44-7	1.17E-05	0.1024
Carbon disulfide	75-15-0	3.14E-05	0.2749
Carbon tetrachloride	56-23-5	2.30E-06	0.0201
Carbonyl sulfide	463-58-1	2.09E-05	0.1832
Chlorobenzene	108-90-7	1.27E-05	0.1114
Chlorodifluoromethane	75-45-6	7.99E-05	0.6998
Chloroethane	75-00-3	5.73E-05	0.5021
Chloroform	67-66-3	1.70E-06	0.0149
Chloromethane	74-87-3	4.34E-05	0.3803
Dichlorobenzene	106-46-7	8.57E-05	0.7504
Dichlorodifluoromethane	75-71-8	1.35E-03	11.8177
Dichlorofluoromethane	75-43-4	1.92E-04	1.6787
Dichloromethane (methylene chloride)	74-87-3	7.18E-06	0.0629
Dioxins and Furans	3268-87-9	7.33E-12	6.42E-08
Ethylbenzene	100-41-4	2.07E-04	1.8161
Ethylene dibromide	106-93-4	1.34E-07	0.0012
Formaldehyde	50-00-0	1.61E-02	140.8201
Fluorotrichloromethane	75-69-4	7.42E-05	0.6500
Hexane, n-	110-54-3	4.02E-04	3.5249
Hydrogen chloride	7647-01-0	7.36E-02	644.5
Hydrogen sulfide	7783-06-4	8.15E-04	7.1393



TAC	CAS	Max. Hourly Emissions, lbs./hr.	Annual Emissions, lbs./year
Mercury (total)	7439-97-6	2.08E-06	0.0182
Methyl ethyl ketone	78-93-3	3.63E-04	3.1828
Methyl isobutyl ketone	108-10-1	6.63E-04	5.8068
Tetrachloroethylene	127-18-4	9.04E-05	0.7917
Toluene	108-88-3	1.77E-03	15.5284
Trichloroethylene	79-01-6	4.14E-05	0.3626
Vinyl chloride	75-01-4	2.06E-05	0.1802
Xylenes	1330-20-7	1.81E-03	15.8901

Air dispersion modeling and a health risk assessment were also performed to analyze air quality impact from this equipment. Please refer to Responses L148-5 and L148-A-6 and Topical Response No. 5.

L148-4 **L148-4, L148-A-5 – Worker Receptor Locations for the Health Risk Assessment**

Based on the SCAQMD FIND database, there are four nearby SCAQMD-permitted facilities. These facilities are Glendale City, Public Works Engineering (Facility ID 37361), Los Angeles County Sanitation District (Facility ID 45262), Scholl Canyon Golf Course (Facility ID 103426), and Agrominn (Facility ID 192443). The health risk assessment does not reflect employees of these facilities as worker receptors because of the following reasons:

- Glendale City, Public Works Engineering Facility is owned and operated by the City of Glendale, which will also own and operate the power generation facility.
- Los Angeles County Sanitation District currently owns and operates flares that will be replaced by the power generation facility. Ultimately the City of Glendale will be the operator for this flare system once the landfill is closed.
- Scholl Canyon golf course employees are included as worker receptors in the updated health risk assessments. Scholl Canyon golf course is located outside the property boundary used in the health risk assessment.
- Agrominn is a waste digester facility; and its operation is only temporary and at the discretion of the City of Glendale. The City of Glendale expects that Agrominn will cease operations by the time the power generation facility is constructed.

L148-5 **L148-5, L148-A-6 – Air Dispersion Modeling Parameters**

Air dispersion modeling and the health risk assessment were completed to reflect the following updated parameters as suggested by SCAQMD comment letter:

- Updated the ambient air quality background concentrations from the original period of 2014 through 2018 to the period of 2015 through 2019.
- Revised the landfill property boundary by reducing the west property boundary of the landfill. The revised facility excludes the Lower Scholl Canyon Park (Park). Additionally, the north boundary of the landfill was adjusted to exclude all the Scholl Canyon Golf Course property.
- Updated Burbank Airport meteorological data from the initial period of 2008 through 2012 to the period of 2012 through 2016.

Table 4 shows the ambient air quality impact analysis results that reflect the above-described changes to model input.

Table 4
Ambient Air Quality Impact Analysis Result
Scholl Canyon Repowering Generation Project

Pollutant	Avg. Period	Project Impact	Background[a]	New Ambient	Limiting Standard	Type of Standard
NO_2[b]	1-HR	0.03702 ppm	0.0719 ppm	0.1089 ppm	0.18 ppm	CAAQS
NO_2[b]	1-HR (98th percent)	0.02083 ppm	0.0593 ppm	0.0801 ppm	0.10 ppm	NAAQS
NO_2[c]	Annual	0.00023 ppm	0.0154 ppm	0.0156 ppm	0.03 ppm	CAAQS
CO	1-HR	0. 1748 ppm	2.60 ppm	2.7748 ppm	20 ppm	CAAQS
CO	8-HR	0.0473 ppm	1.60 ppm	1.6473 ppm	9 ppm	CAAQS
PM10	24-HR	1.373 ug/m^3	96 ug/m^3	97.373 ug/m^3	Allowable increase of 2.5 ug/m^3	CAAQS / SCAQMD Allowable Increase
PM10[d]	24-HR (6th highest over 5 years)	1.046 ug/m^3	96 ug/m^3	97.046 ug/m^3	150 ug/m^3	NAAQS
PM10	Annual	0.193 ug/m^3	34.4 ug/m^3	34.593 ug/m^3	Allowable increase of 1.0 ug/m^3	CAAQS / SCAQMD Allowable Increase
PM2.5	24-HR	1.373 ug/m^3	30.5 ug/m^3	31.873 ug/m3	Allowable increase of 2.5 ug/m^3	CAAQS / SCAQMD Allowable Increase
PM2.5[e]	24-HR (8th highest)	0.956 ug/m^3	30.5 ug/m^3	31.456 ug/m3	35 ug/m^3 Below SIL of 1.2 ug/m^3	NAAQS EPA Significant Impact Level (SIL)

PM2.5	Annual	0.193 ug/m^3	12.58 ug/m^3	12.773 ug/m^3	Below SIL of 0.3 ug/m^3 Allowable increase of 1.0 ug/m^3	EPA Significant Impact Level (SIL) CAAQS / SCAQMD Allowable Increase
SO_2	1-HR	0.0032 ppm	0.018 ppm	0.0212 ppm	0.25 ppm	CAAQS
SO_2[f]	1-HR (99th percent)	0.00229 ppm	0.0094 ppm	0.0117 ppm	0.075 ppm	NAAQS
SO_2	24-HR	0.00071 ppm	0.002 ppm	0.0027 ppm	0.04 ppm	CAAQS

Notes:
a) Background values are based on the highest concentrations monitored at West San Gabriel Valley monitoring station (Station No. 088) during 2015 through 2019, except the PM10 and SO_2. The background values of PM10 and SO_2 were based on the readings from the Central Los Angeles monitoring station (Station No. 087) since the West San Gabriel Valley monitoring station did not record any background data for those pollutants.
b) NO2 1-hour modeling was refined using the AERMOD Ambient Ratio Method (ARM) option, which assumes an 80 percent conversion factor of NOX to NO_2
c) NO2 annual modeling was refined using the AERMOD ARM option, which assumed a 75 percent conversion factor of NOX to NO2.
d) PM10 24-hour modeled values were based on the maximum 6th highest concentration over 5 years period.
e) PM2.5 24-hour modeled values were based on the 8th highest concentration averaged over 5 years period with the background concentrations of 98th percentile of 24-hour data averaged over 5 years period.
f) SO2 1-hour modeled values were based on the 4th highest concentration averaged over 5 years period with the background concentrations of 99th percentile of 1-hour data averaged over 5 years period.
g) There are receptors surrounding the facility at lower and higher elevations than the emission sources. The model reflects non-default option (flat terrain) on all receptors at lower elevations; and a default option (complex terrain) was selected to on receptors above the emission sources base elevation.

As shown in Table 4, the modeled highest concentration of NO_2, CO, and SO_2 plus the applicable background concentration did not result in any exceedances of the federal and state AAQS. For PM10 and PM2.5, the modeled maximum concentrations from the Project did not cause any exceedances of the state significant thresholds. Attachment B of the errata includes additional information regarding model input / output files.

Health Risk Assessment

Based upon the updated LFG production and air dispersion models, a health risk assessment (HRA) was conducted to evaluate the potential cancer, chronic, and acute health impacts from the Project. The HRA was prepared in accordance with Office of Environmental Health Hazard Assessment (OEHHA) guideline dated February 2015 and SCAQMD Risk Assessment Procedures for Rule 1401, 1401.1, and 212

Version 8.0 dated June 5, 2015. Two software programs, AERMOD and HARP2, were utilized for the HRA. AERMOD is an air dispersion model that was used to estimate the ground level TAC concentrations and the Hotspots Analysis and Reporting Program (HARP2) was used to estimate the cancer and non-cancer health impacts for individual receptors using ground level concentration data for multiple pollutants through multiple pathways.

The following Table 5 summarizes the highest maximum individual cancer risk (MICR), hazard index acute (HIA), and hazard index chronic (HIC) values at any receptor locations outside the facility boundary.

TABLE 5
HEALTH RISK ASSESSMENT RESULT

Equipment[a]	Cancer Risk	Chronic Health Index	Chronic 8-hour Health Index	Acute Health Index	Cancer Risk Significance Threshold	Acute / Chronic Index Significance Threshold
Project	0.26E-06	0.016	0.0008	0.0076	10.00E-06	1.00

Note: The cancer risk, chronic health index, chronic 8-hour health index, and acute health index values of the proposed project shown in Table 5 are the highest values of any receptors outside the landfill property boundary. Since the values are already below the significance threshold of 10E-06 for cancer risk and 1.00 for the health index, no further analysis was conducted to obtain readings at the nearest residential or worker receptors.

Pursuant to OEHHA Guideline and SCAQMD policy, if MICR at a representative receptor location is greater than 1.00E-06, an additional analysis must be conducted to determine Cancer Burden. As shown in the Table 5, the MICR for the Proposed Project is less than 1.00E-06; therefore, Cancer Burden analysis is not necessary. Attachment C of the errata includes additional information regarding the health risk assessment.

L148-6 Please refer to Topical Response No. 5 that includes a discussion of potential air quality/health risk impacts of the regenerative flare.

L148-7 Please refer to Topical Response No. 5 and Responses L148-1 to L148-7 and L148-A-1 to L148-A-6.

L148-A-1 The comment summarizes the proposed Project description and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L148-A-2 The comment summarizes the permit applications SCAQMD has received from the City of Glendale for the proposed Project. The comment is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L148-A-3 SCAQMD's comment letter provides its interpretation of the findings of significance in the Draft EIR, but that interpretation reflects an incomplete review of the Draft EIR because SCAQMD's summary of the Project does not reflect the full analysis and findings in the Draft EIR. The Draft EIR's potential air quality impact analysis determines that the Project's daily CO emissions would exceed the daily 550-pound significance threshold (Draft EIR, Section 4.2.4.4 Table 13), however, the Draft EIR includes a refined ambient air quality impact analysis, and based upon that more refined analysis it was determined that the Project will have a less than significant impact on AQ. SCAQMD CEQA policy allows a refined ambient air quality analysis in place of mass daily emissions to determine the significance of CO emissions. Table 15 of the Draft EIR contains results of the refined ambient air quality impact analysis. When added to existing background concentrations, the Project would present a maximum ambient CO concentration of 2.77 ppm (approximately 13.8% of the 20 ppmv ambient air quality standard for CO). On an 8-hour averaging basis, the impacts of the Project would lead to a maximum concentration of approximately 1.6 ppm (approximately 18% of the 9 ppm ambient air quality standard). The results of the refined air quality impact analysis demonstrate that CO emissions from the Project would not significantly add to existing ambient CO concentrations, nor would it result in a violation of federal or state ambient air quality standards for CO (an "attainment" criteria air pollutant for which the South Coast Air Basin has met both federal and state ambient air quality standards for since 2007). Based upon the results of the ambient air quality impact analysis, the City concluded that CO emissions from the Project would be less than significant. The City further stated in section 6.1 of the Draft EIR, that the Project would not result in any significant and unavoidable environmental impacts based on the refined air quality impact analysis. The complete air quality analysis accurately reflects that CO emissions would not result in violation of ambient air quality standards and would have a less than significant air quality impact.

L148-A-4 Please refer to Topical Response No. 5 that includes a discussion of potential air quality/health risk impacts of the regenerative flare.

L148-A-5 Please refer to Topical Response No. 5 that includes a discussion of potential air quality impacts related to the report boundary suggested for consideration by SCAQMD.

L148-A-6 Please refer to Topical Response No. 5 that includes a discussion of potential air quality impacts related to changes in baseline conditions between preparation of the MND and EIR.

L148-A-7 Responses to SCAQMD comments of the Draft EIR have been noticed to SCAQMD pursuant with CEQA requirements. Please refer to Responses L148-1 to L148-7 and L148-A-1 to L148-A-6.

L148-B-1 to
L148-B-5 These are the 2017 comments from SCAQMD on the MND and are no longer applicable to the Draft EIR.

L149 - Responses to Comments from Susan Harris, received September 30, 2020

L149-1 Please refer to Topical Response No. 5.

L149-2 Please refer to Topical Response No. 9.

L150 - Responses to Comments from Teresa, received September 30, 2020

L150-1 Please refer to Topical Responses No. 5 and 9.

L150-2 Please refer to Topical Response No. 5.

L150-3 Please refer to Topical Response No. 9.

L150-4 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. Please refer to Topical Response No. 10.

L151 - Responses to Comments from Glendale Environmental Coalition and Sierra Club, received October 1, 2020

L151-1 The comment introduces the Glendale Environmental Coalition (GEC) and Sierra Club, identifies their relationship to Glendale, and presents their goal of advocating for clean energy. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L151-2 The comment provides a background of the Project and environmental review.

L151-3 The environmental impact thresholds of significance included in the Draft EIR are based on CEQA Guidelines and requirements. Neither CEQA nor the CEQA Guidelines require that an EIR include studies comparing the project's environmental costs with its benefits. See *San Francisco Ecology Ctr. v City & County of San Francisco* (1975) 48 CA3d 584, 595. The only direct comparison required in an EIR is the comparison of project alternatives, and a cost-benefit analysis is not required in making that comparison. 14 Cal Code Regs §15126.6(d). Please also refer to Topical Response No. 10.

L151-4 The Project has been designed and potential environmental impacts analyzed based on measurable data such as LFG volume and chemical composition. The Project has further been designed to meet applicable regulatory requirements such as stormwater pollution

prevention and air emissions. Please refer to Topical Response No. 5 and Response L5-1.

L151-5 Please refer to Topical Responses No. 1 and 5.

L151-6 Please refer to Topical Response No. 5

L151-7 The objective of the Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate power. Please also refer to Responses L110-11 and L110-15.

L151-8 The comment is a general statement about the commenter's opinion of (or preference about) the Project. Please refer to Topical Reasons No. 5. The reduction in LFG impacts in inherent in the Project objectives. The burning of biogas to generate power meets the goals of SB 100 and qualifies under California's Renewable Portfolio Standard for use of a renewable power source, and thus assists the City to meet and exceed state requirements for renewable electricity generation. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. See also Response L143-5.

L151-9 Please refer to Topical Response No. 5.

L151-10 Please refer to Topical Response No. 5. The existing permitted flaring system is not operated by the City of Glendale; it is owned, operated, and managed by the Los Angeles County Sanitation District.

L151-11 The estimated construction emissions presented in Section 4.2 of the Draft EIR includes emissions from portable construction equipment such as generators. Construction emissions would be below SCAQMD thresholds of significance. Please refer to Topical Responses No. 5 and 9.

L151-12 Please refer to Topical Response No. 5.

L151-13 Please refer to Responses. No. L110-11, L110-15 and L95-13. The alternatives evaluation in Section 5.0 of the Draft EIR further consider or evaluate each alternative suggested during public scoping for the Draft EIR. Please also refer to Topical Response No. 10.

L151-14 Please refer to Response L151-13. Please refer to Topical Response No. 10.

L151-15 Please refer to Response L151-13. Please refer to Topical Responses No. 5 and 10.

L151-16 Please refer to Topical Responses No. 5 and No. 10 and Response L94-15.

L151-17 Please refer to Topical Responses No. 5 and No. 10.



L151-18 Alternative 2 would require more energy than the Project as more energy would be expended to clean the LFG to a higher standard required for conversion to RNG and more energy would be required to compress the RNG for offsite conveyance. Section 5.6.2.2 of the Draft EIR currently notes that Alternative 2 would utilize more energy than the Project and therefore Alternative 2's potential energy use impacts would be greater than those of the Project. Please refer to Topical Response No. 10.

L151-19 Similar to Alternative 2, Alternative 3 would require more energy to clean the LFG to a higher standard for conversion to LNG as well as more energy necessary to support a vehicle fueling station than the energy use of the Project. Therefore, Alternative 3's potential energy use impacts would be greater than those of the Project. An Alternative project location at Grayson Power Plant was evaluated as Alternative 4 because it is the only location within the City of Glendale that is under City control, potentially had adequate space, has industrial zoning, and existing infrastructure connections for electoral generation needs. Development of a site that did not have these attributes would have greater environmental impacts than those for Alternative 4 and would not reduce any significant environmental impacts of the Project. Please refer to Topical Response No. 10 and Response L151-18.

L151-20 Existing Unit 9 and the generation units proposed as part of the Grayson Repowering Project are not designed to operate on LFG. The existing boilers which are designed to operate on LFG are no longer combusting LFG or planned to combust LFG in the future. Because the generation units operating on LFG would be located closer to residences under Alternative 4 than the proposed Project, Alternative 4 would have greater air quality and noise impacts than the Project. There would be an incremental increase in GHG emissions associated with Alternative 4 from an increase in energy needed to convey the LFG to an offsite location. Please refer to Topical Response No. 10. The commenter states opposition to Alternative 4 due to environmental impacts and additional infrastructure at Grayson Power Plant. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 10.

L151-21 Please refer to Topical Response No. 10 and Responses L110-11 and L110-15.

L151-22 The commenter states that the scope of the CEQA document should be for the 2019 Integrated Resources Plan rather than limited to the Project. Adoption of the 2019 Integrated Resources Plan was found to be exempt from CEQA. The proposed Project's potential environmental impacts were evaluated pursuant with the requirements of CEQA in this EIR. Please refer to Topical Responses No. 1, 2, and 3.

L151-23 The commenter provides a summary of comments and concerns expressed throughout the comment letter and requests that the City release the Final EIR for public review at



least 45 days before it is presented to the Planning Commission or any other commission or governmental body, to allow a full opportunity for public participation in this decision that is crucial to our community. The comment also expresses support of Alternative 2, converting LFG to natural gas, and the rejected fuel-cell alternative. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 10.

L152 - Responses to Comments from Mark Alan Rothenberg, received October 1, 2020

L152-1 Please refer to Topical Responses No. 1, 5 and 7.

L152-2 Please refer to Topical Response No. 9.

L152-3 Please refer to Topical Response No. 9.

L152-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 1, 5, 7, and 9.

L152-5 Please refer to Topical Responses No. 1, 5, 7, and 9.

L152-6 Please refer to Section 4.9 of the Draft EIR for a discussion of the Project's consistency with applicable land use designations and zoning which were determined to be less than significant.

L153 - Responses to Comments from Nicole and Brian McGaffey, received October 1, 2020

L153-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L153-2 Please refer to Topical Response No. 5.

L153-3 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. The Draft EIR analyzes the Project's potential impacts to sensitive receptors including residential and education land uses. Please also refer to Topical Responses No. 5, 6, 7, 8, and 9 for a discussion related to air quality, geology, hazards and hazardous materials, noise, traffic, and wildfire.

L153-4 Please refer to Topical Responses No. 7 and 9.



L153-5 Please refer to Topical Responses No. 1, 6, and 7.

L153-6 The comment expresses support of Alternative 2, converting LFG to natural gas. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L153-7 Please refer to Topical Response No. 1.

L154 - Responses to Comments from Raymond Cho, received October 1, 2020

L154-1 Please refer to Topical Responses No. 1, 4, 5, and 8.

L154-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. Please also refer to Topical Response No. 5. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L155 - Responses to Comments from The Eagle Rock Association (TERA), received October 1, 2020

L155-1 The comment is a transmittal of an attached comment letter submitted by Greg Merideth on behalf of the Eagle Rock Association (TERA). The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L155-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L155-3 Please refer to Topical Response No. 9.

L155-4 The comment expresses support of Alternative 2, converting LFG to natural gas. Please also refer to Topical Responses No. 2 and 5. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 10.

L155-5 Please refer to Topical Responses No. 3 and 5.

L155-6 Please refer to Topical Responses No. 1, 5, 7, and 9.

L156 - Responses to Comments from Walt Kasha, received October 5, 2020

L156-1 The commenter introduces themself and identifies their relationship to Glenoaks Canyon. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L156-2 The commenter directly reiterates comments submitted by Priscila Kasha on September 6, 2020. Please refer to responses to comments of L41 from Priscila Kasha, received September 6, 2020. Please also refer to Topical Response No. 10.

L157 - Responses to Comments from Armen and Chantiel M., received October 5, 2020

L157 Comments (L157-1 through L157-5) reiterate comments submitted by Marwan and Amy Ataya on September 6, 2020. Please refer to responses to comments of to L40.

L157-6 The comment expresses support of Alternative 2, converting LFG to natural gas. Please refer to Section 5.0. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 10.

L158 - Responses to Comments from Hilda L. Solis, County of Los Angeles Board of Supervisors, First District, received March 3, 2021

L158-1 The comment notes Ms. Solis's representation of Eagle Rock and sharing of community concerns regarding the Project. Please refer to Sections 4.1 through 4.14 of the Draft EIR for a discussion of the Project's potential environmental impacts. Please also refer to Topical Responses No. 1 through 10 for supplemental information and clarification contained in the Final EIR based on comments received during public review of the Draft EIR.

L158-2 Please refer to Topical Response No. 9.

L158-3 Please refer to Topical Responses No. 7 and 9 as well as Response to L139.

L158-4 Please refer to Response L127-5.

L158-5 Please refer to Responses L110-11 and L110-115 and Topical Response No. 7.

L158-6 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

10.0 MITIGATION MONITORING AND REPORTING PLAN

The following mitigation measures shall apply to the Grayson Repowering Project to reduce identified impacts to less than significant levels.

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
BIO-1	**BIO-1: Implement a Worker Environmental Awareness Program.** Prior to any Project activities on the site (i.e., surveying, mobilization, fencing, grading, or construction), a Worker Environmental Awareness Program (WEAP) shall be prepared and implemented by a qualified biologist(s). The WEAP shall be finalized and administered prior to construction mobilization, and implemented throughout the duration of the construction activities, such as when new contractor employees or subcontractors begin working on-site. • The WEAP shall include, at a minimum, the following items: o Training materials and briefings shall include but not be limited to: a discussion of the Federal and State Endangered Species	Prior to construction mobilization, and throughout the duration of the construction activities.	City of Glendale	Glendale Water and Power Environmental Coordinator	Review and approval of WEAP prior to construction. Retention of WEAP training logs.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	Acts, Bald and Golden Eagle Protection Act, and the Migratory Bird Treaty Act; the consequences of non-compliance with these acts; identification and values of plant and wildlife species and significant natural plant community habitats; hazardous substance spill prevention and containment measures; a contact person and phone number in the event wildlife needs to be relocated or dead or injured wildlife is discovered; and a review of mitigation requirements. ▪ A discussion of measures to be implemented for avoidance of the sensitive resources discussed above and the identification of an onsite contact in the event of the discovery of sensitive species on the site; this					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	shall include a discussion on microtrash. ▪ Protocols to be followed when roadkill is encountered in the work area or along access roads and the identification of an onsite representative to whom the roadkill will be reported. Roadkill shall be reported to the appropriate local animal control agency within 24 hours. ▪ Maps showing the known locations of special-status wildlife, populations of rare plants and sensitive vegetation communities, seasonal depressions and known waterbodies, wetland habitat, exclusion areas, and other construction					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	limitations (e.g. limited operating periods, etc.). These features shall be included on the proposed Project plans and specifications drawings. ▪ Literature and photographs or illustrations of potentially occurring special-status plant and/or wildlife species shall be provided to all Project contractors and heavy equipment operators. • Evidence that all onsite construction and security personnel have completed the WEAP prior to the start of site mobilization. A special hardhat sticker or wallet size card shall be issued to all personnel completing the training, which shall be carried with the trained personnel at all times while on the proposed Project site. All new personnel shall receive					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	this training and may work in the field for no more than five days without participating in the WEAP, accompanied by staff that has undergone the training. A log of all personnel who have completed the WEAP training shall be kept on-site. • The contract specification books shall include all project conditions as they relate to biological resources and shall be kept on-site at all times (e.g., in the break room, construction foreman's vehicle, construction trailer, etc.) for the duration of the construction. This information shall be easily accessible for personnel in all active work areas. • Develop a standalone version of the WEAP, that covers all previously discussed items above, and that can be used as a reference for maintenance personnel during Project operations. • An environmental monitor shall be retained during construction of the					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	proposed project and shall be directly involved with the implementation and enforcement of the WEAP. A log of all personnel who have completed the WEAP training shall be kept on-site.					
BIO-2	BIO-2 Implement Best Management Practices Best Management Practice (BMP) shall be implemented as standard operating procedures during all ground disturbance and construction-related activities to avoid or minimize Project impacts on biological resources. These BMPs shall include, but are not limited to, the following: • Compliance with BMPs shall be documented and provided in a written report upon conclusion of construction activities. The report shall include a summary of the construction activities completed, a review of the sensitive plants and wildlife encountered, a list of compliance actions and any remedial actions taken to correct the actions, and the	During demolition and construction.	Demolition and Construction Contractor(s)	Glendale Water and Power Environmental Coordinator	Environmental monitoring and recordkeeping showing compliance BMPs.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	status of ongoing mitigation efforts. • Prior to ground disturbance of any kind, the project work areas shall be clearly delineated by stakes, flags, or other clearly identifiable system. • Vehicles and equipment shall be parked on pavement, existing roads, and previously disturbed areas to the extent practicable. • No vehicles or equipment shall be refueled within 100 feet of an ephemeral drainage or wetland unless a bermed and lined refueling area is constructed. Spill kits shall be maintained on-site. • All general trash, food-related trash items (e.g., wrappers, cans, bottles, food scraps, cigarettes, etc.) and other human-generated debris shall be stored in animal proof containers and/or removed from the site each day. No deliberate feeding of wildlife shall be allowed. • All pipes and culverts removed from (that remain					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	on-site after removal) or brought on-site as part of new construction, with a diameter of greater than 4 inches, shall be capped or taped closed. Prior to capping or taping the pipe/culvert shall be inspected for the presence of wildlife by a qualified biologist. If encountered, wildlife shall be allowed to escape unimpeded. • No firearms shall be allowed on the project site, unless otherwise approved for security personnel. • To prevent harassment or mortality of listed, special-status species and common wildlife, or destruction of their habitats, no domesticated animals of any kind shall be permitted in any project area. • Use of chemicals, fuels, lubricants, or biocides shall be in compliance with all local, state and federal regulations, and shall include secondary containment. All uses of such compounds shall observe label and other restrictions mandated by					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	the U.S. Environmental Protection Agency, California Department of Food and Agriculture, and other state and federal legislation, as well as additional project-related restrictions deemed necessary by the USFWS and CDFW. • Any contractor or employee that inadvertently kills or injures a special-status animal, or finds one either dead, injured, or entrapped, shall immediately report the incident to the onsite representative identified in the WEAP. The representative shall contact the USFWS, CDFW, and the City of Glendale by telephone by the end of the day, or at the beginning of the next working day if the agency office is closed. In addition, formal notification shall be provided in writing within three working days of the incident or finding. Notification shall include the date, time, location and circumstances of the incident. Any threatened or endangered species found					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	dead or injured shall be turned over immediately to CDFW or USFWS for care, analysis, or disposition. o Avoidance of vegetation removal or any other construction activities outside of the proposed Project boundaries. All Project impact areas must be clearly flagged prior to initiating work. In areas of temporary impacts, native vegetation shall be cut to ground level and the root system left intact to permit resprouting following work (unless within required fire clearance areas). All non-native vegetation within the temporary impact area shall be removed initially, and any regrowth eliminated throughout construction, the habitat restoration period and during the O&M phase. o Avoidance and minimization of construction activities resulting in impacts to					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	streambeds and banks of any ephemeral drainage. o All excavation, steep-walled holes or trenches in excess of 6 inches in depth shall be covered at the close of each working day by plywood or similar materials or provided with one or more escape ramps constructed of earth dirt fill or wooden planks. Trenches shall also be inspected for entrapped wildlife each morning prior to onset of construction activities and immediately prior to covering with plywood at the end of each working day. Before such holes or trenches are filled, they shall be thoroughly inspected for entrapped wildlife. Any wildlife discovered shall be allowed to escape before construction activities are allowed to resume or removed from the trench or hole					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	by a qualified biologist holding the appropriate permits (if required).					
BIO-3	**BIO-3 Implement Biological Construction Monitoring**. Prior to the commencement of ground disturbance or site mobilization activities, the City of Glendale shall retain a qualified biologist(s) to monitor Project construction. The biologist will have demonstrated expertise with special- status plants, terrestrial mammals, reptiles, and birds. Monitoring will occur continuously during initial ground disturbance for the duration of construction activities. Once initial ground disturbance is complete, monitoring will occur periodically during all construction activities within these areas. Activities related to the installation of the gas and water pipelines should be monitored daily for the duration of construction (not just initial ground disturbance). The qualified biologist(s) shall be present at all times during ground-disturbing activities immediately adjacent to, or within, habitat that supports populations of listed or special- status species. Any special-status plants shall be flagged for avoidance. Any special-status terrestrial species found within a Project impact area shall be	Prior to and during demolition and construction.	City of Glendale for retention of biologist. Retained biologist for construction monitoring.	Glendale Water and Power Environmental Coordinator	Biological monitoring and recordkeeping for each monitoring event.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	relocated by the authorized biologist to suitable habitat outside the impact area; relocation will be guided by the species specific list (or plan) as described further below in this measure. Surveys for special-status species shall be conducted by the authorized biologist prior to the initiation of construction each day prior to Project construction activities. Pre-construction clearance surveys should be conducted within the entirety of Project site. If nesting birds are found during the pre-construction surveys, buffers shall be installed (as prescribed in Mitigation Measure BIO-5 Conduct Pre-construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures discussed below. If, during construction, the biological monitor observes a dead or injured special-status wildlife species on the construction-site; the City of Glendale, CDFW, and USFWS (as appropriate) should be notified by the end of the work day or the following morning if the required agency office is closed. A written report shall be sent to the City of Glendale, CDFW, and USFWS (as appropriate) within three calendar					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	days. The report will include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Injured animals will be taken immediately to the nearest appropriate veterinary or wildlife rehabilitation facility. The biological monitor shall, immediately upon finding the remains or injured animal, coordinate with the onsite construction foreman to discuss the events that caused the mortality or injury, if known, and implement measures to prevent future incidents. Details of these measures shall be included with the report. Work in the immediate area may only resume once the proper notifications have been made and additional measures have been identified to prevent additional injury or death. Species remains shall be collected and frozen as soon as possible, and CDFW and USFWS, as appropriate, shall be contacted regarding ultimate disposal of the remains. A qualified biologist should prepare a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas. The list (or					



MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	plan) of protocols should be implemented during Project construction and activities/biological construction monitoring. The qualified biologist, in coordination or on behalf of the City, may consult with CDFW to prepare species-specific protocols for proper handling and relocation procedures.					
BIO-4	**BIO-4 Conduct Pre-construction Floristic Plant Surveys.** The City shall conduct two appropriately timed floristic surveys, following current CDFW and CNPS protocols, within the Project impact areas and within a 100-foot buffer in the spring/summer prior to the start of construction. Upon completion of the surveys a detailed report will be prepared and provided to the USFWS and/or CDFW for review; all occurrences of special-status species will be flagged in the field and GPS coordinates obtained for each individual or population. Prior to the start of construction activities (including vegetation removal) a qualified biologist(s) will conduct pre-construction surveys for State and federally Threatened, Endangered, Proposed, Petitioned, Candidate, and Special-status Plants and Avoid Any Located Occurrences of Listed Plants or	Prior to demolition and construction.	City of Glendale for retention of biologist. Retained biologist for construction monitoring.	Glendale Water and Power Environmental Coordinator	Biological monitoring and recordkeeping for each monitoring event.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	Perform other Conservation Strategy. The City of Glendale shall conduct focused surveys for federal- and state-listed and other special-status plants. All special-status plant species (including listed threatened or endangered species, and all CRPR 1A, 1B, 2, 3, and 4 species) subject to disturbance shall be documented in a pre-construction survey report. Surveys shall be conducted during the appropriate season in all suitable habitat located within the proposed Project disturbance areas and within 100 feet of disturbance areas and access roads and be conducted by a qualified botanist. The field surveys and reporting must conform to current CDFW botanical field survey protocols (CDFW, 2009) or more recent updates, if available. The report will describe any conditions that may have prevented target species from being located or identified, even if they are present as dormant seed or below-ground rootstock (e.g., poor rainfall, recent grazing, or wildfire). If federally or State-listed plants are detected in disturbance areas or within 100-feet of the disturbance areas, the City of Glendale would					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	avoid these populations and notify the USFWS and CDFW as appropriate. The City of Glendale shall avoid impacts to any State or federally listed plants to the extent feasible. If Project activities result in the loss of more than ten percent of the known individuals within a special-status plant species (List 3 and List 4 only) occurrence/population to be impacted, the City of Glendale shall consult with USFWS and CDFW regarding the most appropriate conservation strategy for the particular species being impacted.					
BIO-5	**BIO-5 Conduct Pre-construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures.** If feasible, conduct initial vegetation removal and construction activities that generate substantial noise and/or dust outside of the recognized nesting bird season to minimize potential direct impacts to nesting birds. Prior to construction activities during the recognized nesting bird season (i.e., mobilization, staging, grading, or construction) the City of Glendale shall retain a qualified avian biologist to conduct pre-	Prior to and during demolition and construction.	City of Glendale for retention of biologist. Retained biologist for construction monitoring.	Glendale Water and Power Environmental Coordinator	Biological surveys, monitoring, and recordkeeping for each survey/monitoring event.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	construction surveys for nesting birds within the recognized breeding season in all areas within 500 feet of all proposed Project components (i.e., pipelines, staging areas, and access road locations). Surveys for raptors shall be conducted for all areas from January 1 to August 15. The required survey dates may be modified based on local conditions, as determined by the qualified avian biologist, in coordination with CDFW and USFWS. Measures intended to exclude nesting birds shall not be implemented without prior approval by CDFW and USFWS. If breeding birds with active nests are found prior to or during construction, the qualified avian biologist shall establish a 300-foot buffer (500 foot for raptors) around the nest and no activities will be allowed within the buffer(s) until the young have fledged from the nest or the nest fails. The prescribed buffers may be adjusted by the qualified avian biologist in coordination with the USFWS and/or CDFW based on existing conditions around the nest, planned construction activities, tolerance of the species, and other pertinent factors. The qualified					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	avian biologist shall conduct regular monitoring of the nest to determine success/failure and to ensure that Project activities are not conducted within the buffer(s) until the nesting cycle is complete or the nest fails. The avian biologist shall be responsible for documenting the results of the surveys, nest buffers implemented, and the results of ongoing monitoring and will provide a copy of the monitoring reports for impact areas to the City of Glendale. Surveys shall be conducted to include all impact areas on the proposed Project site as well as all construction equipment. If birds are found to be nesting in facility structures or construction equipment and the nests contain eggs or young, buffers as described above shall be implemented. If trees with nests are to be removed as part of Project construction activities, this will be done outside of the nesting season to avoid additional impacts to nesting raptors. If removal during the nesting season cannot be avoided, all trees will be inspected for active nests by the avian biologist. If nests are found within these trees and contain eggs or young, no activities within a 300-					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	foot buffer for nesting birds and/or a 500-foot buffer for nesting raptors shall occur until the young have fledged the nest.					
BIO-6	**BIO-6 Conduct Surveys for Terrestrial Herpetofauna and Implement Monitoring, Avoidance, and Minimization Measures.** Prior to ground disturbance or vegetation clearing at all Project locations, the City of Glendale shall retain a qualified biologist to conduct surveys for terrestrial herpetofauna where suitable habitat is present and directly impacted by construction vehicle access. Surveys should place an emphasis towards identifying any Species of Special Concern (SSC) including (but not limited to) the southern California legless lizard; California glossy snake; coastal whiptail; coast horned lizard; and San Diego desert woodrat. Focused surveys shall consist of a minimum of three daytime surveys and one nighttime survey within one week of vegetation clearing. The qualified biologist will be present full time during all vegetation removal activities immediately adjacent to or within habitat that supports terrestrial herpetofauna, and part time for all remaining activities.	Prior to ground disturbance or vegetation clearing.	City of Glendale for retention of biologist. Retained biologist for biological surveys.	Glendale Water and Power Environmental Coordinator	Biological surveys and recordkeeping for each monitoring event.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	Surveys for terrestrial herpetofauna shall be conducted by the qualified biologist prior to the initiation of each day of vegetation removal activities in suitable habitat. Terrestrial herpetofauna found within the area of disturbance or potentially affected by the proposed Project will be relocated to the nearest suitable habitat that will not be affected by the proposed Project.					
BIO-7A	**BIO-7A Conduct Pre-Construction Maternity Colony or Hibernaculum Surveys for Sensitive Bats.** No more than 15 days prior to Project construction activities near trees, or which involve removal of trees or other structures, the City shall retain a qualified biologist who has a CDFW collection permit and a Memorandum of Understanding with CDFW allowing the biologist to handle bats. That biologist shall conduct pre-construction surveys for sensitive bats. Surveys shall also be conducted during the maternity season (1 March to 30 September) within 100 feet of Project activities. If active maternity roosts or hibernacula are found, the structure, tree or tower occupied by the roost shall be avoided (i.e., not	No more than 15 days prior to construction activities near trees, or which involve removal of trees or other structures.	City of Glendale for retention of biologist. Retained biologist for biological surveys.	Glendale Water and Power Environmental Coordinator	Biological surveys, reporting, and document review.	



MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	removed), if feasible; work shall not occur within 100 feet of or directly under or adjacent to an active roost and work shall not occur between 30 minutes before sunset and 30 minutes after sunrise. If avoidance of the maternity roost is not feasible, the biologist shall survey (through the use of radio telemetry or other CDFW methods) for nearby alternative bat maternity colony sites. If the biologist determines in consultation with the CDFG that there are alternative roost sites used by the maternity colony and young are not present then no further action is required, and it will not be necessary to provide alternate roosting habitat. If there are no alternative roosts sites used by the maternity colony, BIO-7B is required. If no active roosts are found, then no further action is required. If active maternity roosts are absent, but a hibernaculum (i.e., a non-maternity roost) is present, then BIO-7B is not necessary, but BIO-7C is required.					
BIO-7B	**BIO-7B Provide Substitute Roosting Habitat for Bats**. If a maternity roost will be impacted by the Project, and no alternative maternity roosts are in use near the site, substitute roosting habitat for the maternity colony shall be	Within three months of impacting a maternity colony (if such event occurs during	City of Glendale	Glendale Water and Power Environmental Coordinator	Review and approval of substitute habitat replacement plan. Documentation demonstrating plan implemented.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	provided on, or in close proximity to, the Project site no less than three months prior to the eviction of the colony. Alternative roost sites will be constructed in accordance with the specific bat requirements in coordination with CDFW. By making the roosting habitat available prior to eviction (BIO-7C), the colony will have a better chance of finding and using the roost. Alternative roost sites must be of comparable size and proximal in location to the impacted colony. The CDFW shall also be notified of any hibernacula or active nurseries within the construction zone. If construction of alternative roost sites is required, the biologist shall provide a written report, documenting the required coordination with CDFW as well as the location of roost sites. This report shall be provided to CDFW.	demolition or construction.				
BIO-7C	**BIO-7C Exclude Bats Prior to Eviction from Roosts.** If non-breeding bat hibernacula are found (for the duration of construction activities) in structures or trees scheduled to be removed, the individuals shall be safely evicted, under the direction of a qualified biologist, by opening the roosting area to allow airflow through the cavity or other means determined	During demolition or construction.	City of Glendale for retention of biologist. Retained biologist for exclusion/eviction.	Glendale Water and Power Environmental Coordinator	Review and approval of substitute habitat replacement plan. Documentation demonstrating plan implemented.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	appropriate by the bat biologist (e.g., installation of one-way doors). In situations requiring one-way doors, a minimum of one week shall pass after doors are installed and temperatures should be sufficiently warm for bats to exit the roost because bats do not typically leave their roost daily during winter months in southern coastal California. This action should allow all bats to leave during the course of one week. Roosts that need to be removed in situations where, in the judgment of the qualified biologist, the use of one-way doors is not necessary shall first be disturbed by various means at the direction of the bat biologist at dusk to allow bats to escape during the darker hours, and the roost tree shall be removed or the grading shall occur the next day (i.e., there shall be no less or more than one night between initial disturbance and the grading or tree removal). If an active maternity roost is located in an area to be impacted by the Project, and alternative roosting habitat is available, the demolition of the roost site must commence before maternity colonies form (i.e., prior to March 1st) or after young are flying (i.e.,					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	after July 31st) using the exclusion techniques described above.					
BIO-8	**BIO-8 Vegetation Removal and Replacement.** Construction activities shall be done in such a manner as to minimize the removal of native vegetation. If impacts to native vegetation removal cannot be avoided, all temporarily impacted plant communities shall be restored at a mitigation ratio of 1:1; the Project will temporarily impact 0.16 acres of California sagebrush-California buckwheat scrub and 0.45 acres of laurel sumac scrub. The compensation for the permanent loss of habitats may be achieved either by a) on-site habitat creation or enhancement of impacted communities with similar species compositions to those present prior to construction, b) off-site creation or enhancement of laurel sumac scrub and California sagebrush-California buckwheat scrub communities, or c) participation in an established mitigation bank program. Permanent impacts to native communities shall be restored/mitigated at a 3:1 ratio for on or off-site habitat restoration/creation or at a 2:1 ratio for participation in an established mitigation banking program; the	During and after construction.	City of Glendale	Glendale Water and Power Environmental Coordinator	Review and approval of contractor construction plans prior to construction. Review and approval of restoration plan and documentation demonstrating plan implementation.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	Project will permanently impact 0.06 acres of California sagebrush-California buckwheat scrub and 2.76 acres of laurel sumac scrub. Prior to the start of any project related activities (including removal of native vegetation), if on or off-site mitigation is required, an ecosystem-based Habitat Mitigation and Monitoring Plan shall be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques that will guide all restoration and monitoring activities. This plan shall include, at a minimum, the following: • Provide the total acreage of unique sensitive vegetation communities impacted, and abundance, density, and cover of each plant species and vegetation layer impacted (i.e. ground cover, forbs, subshrub, shrub, and trees). • Provide the specific location of on- and/or off-site mitigation area(s) and a science based factual discussion as to why the mitigation area(s) is appropriate for mitigating Project-related impacts.					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	Describe the environmental features (i.e., soils, slope, existing vegetation, hydrology) that would suggest the mitigation area(s) can support the vegetation and wildlife impacted by Project activities. • Provide a vegetation survey conducted at a reference site containing the vegetation communities being mitigated, with as good or better quality habitat, to document the density, abundance, diversity, and percent cover for each species by vegetation layer. • A schematic depicting the mitigation area • Proposed species list for creation/enhancement. A plant palette shall consist of species that are diverse with respect to growing duration (annual, perennial), life form (grasses, shrubs, trees, vines), and structure (ground cover, shrubs, tree canopy) that form the vegetation alliance that is being mitigated.					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	• Planting/seeding methodology (e.g., sources of local propagules, container sizes, and seeding rates). • Planting schedule. • Irrigation plan. • Weeding schedule; and invasive plant control methods that reduces or eliminates the use of chemicals. • Success criteria. • Monitoring methodology and schedule extended across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought. • Reporting requirements. • Prior to any Project construction and activities, the perimeter of the 3.37 acres of laurel sumac scrub and California sagebrush-California buckwheat scrub be clearly delineated by temporary stakes, flags, or other clearly identifiable system. Fencing will be accompanied by signage. During WEAP, workers will be advised not to cut, clear,					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	pull, or trample vegetation; toss or pile debris and garbage; or otherwise impact vegetation beyond the demarcated area. Temporary fencing and signage should be maintained for the duration of the Project and removed after Project construction and activities are completed.					
HAZ-1	**HAZ-1: Worker Training.** Prior to construction, all construction-site workers will be trained to recognize and respond to spills as mandated by the required plans, including which authorities to contact. The crews will be supplied with, and trained in, the use of containment devices and spill kits which contain at a minimum sorbent booms and pads, personal protective equipment and detailed emergency response guidance. The workers will also be trained in the proper response to a small incidental spill and the proper procedures in the event of a spill or landfill gas leak as the proper containment and disposal procedures. Records of all training will be sent to the City at the end of each Project construction	Prior to construction.	City of Glendale	Glendale Water and Power Environmental Coordinator	Review and approval of worker training logs.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	phase along with a report detailing the training plans.					
HAZ-2	**HAZ-2: Maintain Equipment.** Prior to entry on the construction-site, and periodically during construction, all construction equipment will be inspected for line breakage and leakage. Any equipment found to be chronically or continuously leaking will be either immediately removed off site or repaired either in place or within the equipment service areas.	Prior to and during construction.	Construction Contractor	Glendale Water and Power Environmental Coordinator	Review of equipment inspection logs.	
HAZ-3	**HAZ-3: Equipment Service Areas.** The Applicant shall designate at least one Equipment Service Area prior to the beginning of construction. The Equipment Service Area shall have a corrosion-resistant secondary containment system installed around the facility. The secondary containment system shall meet the following requirements (at a minimum): • All hazardous materials (including fuel) must be stored either within the Equipment Service Area, or within their own secondary containment systems. • The system must be impervious, cover the entire Equipment Service Area, and free of cracks or gaps.	Prior to construction.	Construction Contractor	Glendale Water and Power Environmental Coordinator	Review and approval of contractor Equipment Service Area.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	• All primary containers shall be elevated above the surface of the secondary containment area. • The secondary containment systems shall have sufficient capacity to contain at least 15 percent of the total volume of the primary containers or 110 percent of the volume of the largest container, whichever is greater. • Precipitation or run-on must be prevented from entering the secondary containment system, unless the system has sufficient capacity to contain any run-on in addition to the volume capacity requirement. All waste (such as spills, leaks, or run-on) that accumulates in the secondary containment area must be removed and disposed of as soon as possible.					
HAZ-4	**HAZ-4: Refueling Practices.** Absorbent material such as secondary containment, pads, or drip pans will be placed underneath all vehicles and equipment during equipment refueling or maintenance. Refueling shall be performed within equipment service areas, parking areas, and gas and	During construction.	Construction Contractor	Glendale Water and Power Environmental Coordinator	Periodic monitoring/site audits.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	oil storage areas whenever possible. Any refueling activity on the site must also be conducted at least 100 feet (30.5 meters) from all designated drainages or areas of native vegetation. Any and all fluids drained from equipment will be collected in leak-proof containers and disposed of at an appropriate recycling facility if possible. If no recycling facility is available, an appropriate disposal facility may be used.					
FIRE-1	**FIRE-1: Fire Protection Plan.** The Applicant shall prepare a construction phase Fire Protection Plan. The Plan shall contain, but not be limited to, the following provisions: 1. Comply with all applicable laws of the State of California and the Fire Prevention Plan. Ensure that a copy of this Fire Prevention Plan and any special permits are to be known and in possession of Project foreman/supervisor on work site daily. 2. A full-time fire watch with appropriately trained personnel and appropriate fire-fighting equipment shall be available and on-site during all times when	Prior to demolition and construction.	Demolition and Construction Contractor	Glendale Water and Power Environmental Coordinator	Review and approval of Fire Protection Plan.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	construction work is taking place. The Applicant shall designate a qualified on-site fire supervisor during Project construction to implement the Fire Protection Plan. Fire Watch personnel shall be responsible for patrolling the construction work area for the prevention and detection of fires, and to make sure all fire regulations and fire prevention plans are met, and to take/direct suppression action where necessary. The Fire Watch personnel shall not be permitted to perform other non-fire-related duties. Fire Watch personnel shall remain on duty for at least one hour after the close of work or sunset (whichever comes first). 3. All construction equipment shall be fitted with appropriate spark arrestors. Spark arrestors shall meet the standards set forth in the National Wildfire Coordinating Group publication for Multi-position Small Engines, #430-1, or					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	General Purpose and Locomotive, #430-2. 4. Unless determined appropriate by the GFD spark arrestors are not required on equipment powered by exhaust-driven turbo charged engines or motor vehicles equipped with a maintained muffler. 5. All construction vehicles and equipment shall carry at least one fully charged fire extinguisher. Fire extinguishers shall be of the type and size set forth in the California PRC Section 4431. Fire extinguishers shall be appropriately maintained throughout construction. The following conditions shall also be incorporated: i. Each truck, personnel vehicle, tractor, grader or piece of heavy equipment shall have one shovel, one axe (or Pulaski) and a fully charged fire extinguisher. ii. Each welder shall have one shovel and one five-gallon water-					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	filled tank with pump. Shovel and five-gallon water-filled tank with pump must be kept within 25 feet of tools when in use. iii. Each gasoline powered tool (such as chainsaws, chippers, rock drills, etc.) shall have one shovel and one pressurized fire extinguisher. Shovels must be kept within 25 feet of tools when in use. iv. All tools and equipment above shall be in good workable conditions, with employee's trained on their use. v. Shovels shall be "O" or larger and be not less than 46 inches in over length. vi. Axes (or Pulaskis) shall have 2.5-pound or larger heads and be not less than 28 inches in overall length 6. Confine welding activities to areas having a minimum					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	radius of ten feet cleared to mineral soil, wet down an area of 25 feet in all directions from the center of welding operations with a 0.3 percent Class A Foam Solution, utilize a welding tent or metal shield where possible to deflect sparks. Fire Watch shall be on standby during welding activities with fire prevention tools including fire extinguishers, shovels, immediate access to a minimum of five gallons of water equipped with a dispensing application. Welding or other hot work shall not occur during red flag events. 7. Refueling shall be performed within previously developed areas a minimum of 25 feet from areas with substantial vegetation or potential ignition source. The Applicant shall participate in the Red Flag Warning program with local fire agencies and the National Weather Service. The Applicant shall stop work during Red Flag conditions. If a Red Flag Warning were to occur during critical work					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	activities, or work activities that cannot be stopped (such as a heavy lift), the GFD shall be immediately notified. Communication protocols shall be outlined in the plan. The GFD shall approve resumption of construction activities.					
FIRE-2	**FIRE-2: Smoking and Open Fires.** Smoking and open fires shall be prohibited for all Project personnel at the site during construction. A copy of the notification prohibiting smoking and fires shall be posted at the construction work areas and included in the worker trainings. This notice shall be provided to the GFD within five business days, upon their request.	During construction.	Demolition and Construction Contractor	Glendale Water and Power Environmental Coordinator	Review and approval of WEAP training that includes prohibition of smoking and open fires.	
FIRE-3	**FIRE-3: Firefighting Water Supply.** The Applicant shall furnish a water truck or trailer on or immediately adjacent to the proposed Project area during construction specifically for firefighting water supply. Fire watch personnel shall be trained on how to access these water tanks in the event of a fire-related incident. The Applicant shall maintain and provide appropriate firefighting equipment to access the water, such as hoses or wrenches. The truck or trailer shall meet the following minimum specifications:	During construction.	Construction Contractor	Glendale Water and Power Environmental Coordinator	Review and approval of firewater supply plan.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	• Water truck and operator must be ready to put fires out at all times • Water truck or trailer shall contain or meet the following specifications: o At least 300 gallons of water o A combination straight stream and fog nozzle with 300 feet of one-inch fire hose, with no segment longer than 50 feet o Fire hose with nozzle closed shall be capable of withstanding 200 psi pump pressure without leaking, slipping or couplings, distortions, or other failures o Nozzle discharge rating of six to 20 gallons per minute o A Pump capable of delivering 23 gallons per minute at 175 pounds psi at sea level o Power unit for pump shall have fuel for at least two hours of operation, be in good working order, with ample transport available for immediate					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	safe movement of tank over roads serving the project area; pump outlet shall be equipped with 1.5-inch National Standard Fire Hose thread o The Water Truck or Trailer MAY NOT be used for other work on the contract o If the proposed Project area in inaccessible to water truck or trailer accessibility, a charged hose capable of reaching 100 feet beyond the proposed Project area is required.					

ATTACHMENTS

Errata Attachment A: Updated Project Emission Inventory

CRITERIA POLLUTANTS EMISSION INVENTORY

EMISSION FACTORS OF THE EMISSION SOURCES
BIOGAS RENEWABLE GENERATION PROJECT

	CONTROLLED EMISSION RATES														
Equipment Type	NO_X		CO		VOC		PM10/2.5		SO_X		NO_X, LBS/HR	CO, LBS/HR	VOC, LBS/HR	PM10/2.5, LBS/HR	SO_X, LBS/HR
GE J 620 GS-F21 (Engine)	11	PPMV	130.1	PPMV	30	PPMV	0.066	g/bhp-hr	10.13	LBS/MMCF	1.22	8.8	1.16	0.61	0.84
Existing Flare System	13.27	LBS/MMCF	1.19	LBS/MMCF	1.3	LBS/MMCF	6.4	LBS/MMCF	5.21	LBS/MMCF					
Regen Flare System	0.025	LBS/MMBTU	0.06	LBS/MMBTU	0.038	LBS/MMBTU	6.1	LBS/MMCF	10.13	LBS/MMCF					
	UNCONTROLLED EMISSION RATES														
GE J 620 GS-F21 (Engine)	66	PPMV	250	PPMV	56	PPMV	0.066	g/bhp-hr	10.13	LBS/MMCF	7.34	16.92	2.17	0.61	0.84

NOTES:

GE J 620 GS-F21 Engine:
- NO_X and VOC emission concentration based on Rule 1110.2 Emission Limits (SCAQMD BACT/LAER).
- CO emission based on manufacturer emission guarantee.
- PM10 emission factor is based on SCAQMD BACT/LAER emission limit.
- SO_X emission factor based on 60 ppmv of sulfur content measured in H2S for Landfill gas (SCAQMD BACT/LAER).
- Enigne parameter is based provided by the manufacturer.
- Landfill gas HHV is estimated based on the landfill gas sampling on 01/06/2016.

Existing Flare System:
- Emission factors is the average of calculated emission factors reported in SCAQMD Annual Emission Report (AER) for the reporting year 2010 through 2014 and Source test concducted on May, 2015.

Regen Flare System:
- NOX, CO, VOC emission factors are based on Rule 1118.1
- PM10 emission factor is based on LACSD permit application number A/N 245157
- SO_X emission factor based on 60 ppmv of sulfur content measured in H2S for Landfill gas (SCAQMD BACT/LAER).

Landfill gas property:
-Landfill gas HHV is estimated based on the current sampling.
-Dry Fuel Factor is estimated based on the average heating values from the lab results sampled from 2010 through May, 2015.

EMISSION INVENTORY FOR THE EMISSION SOURCES
BIOGAS RENEWABLE GENERATION PROJECT

GE J 620 GS-F21 **30 MINUTES STARTUP, 8 MINUTES SHUTDOWN**

Pollutant	No. of Normal Operating Hours per Day	Normal Operating Hour Emission Rate	No. of Startups Per Day	Uncontrolled Emission lb / Startup	No. of Shutdowns Per Day	Uncontrolled Emission lb / Shutdown	No. of Maintenance Operating Hours per Day	Maintenance Operating Hour Emission Rate	Number of Startups/ Shutdowns per Month	Number of Normal Operating Hours Per Month	Number of Startups/ Shutdowns per Year	Number of Normal Operating Hours Per Year
NO_X	12.73	1.22	2	23.50	2.00	7.40	10	7.34	10	704	120	8674
CO	12.73	8.80	2	24.00	2.00	29.20	10	16.92	10	704	120	8674
VOC	12.73	1.16	2	1.20	2.00	0.46	10	2.17	10	704	120	8674
PM10	12.73	0.61	2	0.30	2.00	0.08	10	0.61	10	704	120	8674
SO_X	12.73	0.84	2	0.42	2.00	0.11	10	0.84	10	704	120	8674

Starts/stops = 1.27 hours/day per engine 6.33 hours/month per engine 76.00 Hours / year per engine
Maintenance = 10 hours/day per engine 10 hours/month per engine 10 Hours / year per engine

Daily = 24 hours with 2 startS Monthly = 720 hours with 10 starts

GE J 620 GS-F21 **EMISSIONS OF 1 ENGINE** **EMISSIONS OF 4 ENGINES**

Pollutant	Daily Maximum Emissions (Lbs)	Monthly Maximum Emissions (Lbs)	30-Day Average Emissions (lbs)	Annual PTE (Lbs)	Annual PTE (Tons)	Daily Maximum Emissions (Lbs)	Monthly Maximum Emissions (Lbs)	30-Day Average Emissions (lbs)	Annual PTE (Lbs)	Annual PTE (Tons)
NO_X	150.73	1,241	41	14,364	7.18	419.34	4,963	165	57,455	28.73
CO	387.65	6,893	230	82,884	41.44	1131.81	27,574	919	331,538	165.77
VOC	39.79	855	28	10,283	5.14	126.10	3,418	114	41,131	20.57
PM10	14.61	438	15	5,332	2.67	57.94	1,753	58	21,327	10.66
SO_X	20.16	605	20	7,358	3.68	79.97	2,419	81	29,434	14.72

*Maximum 1 Engine per day in the maintenance operation

EMISSION INVENTORY FOR THE EXISTING FLARE SYSTEM
BIOGAS RENEWABLE GENERATION PROJECT

LFG COMBUSTED: 0.06848 MMSCF/HR 1141.36 SCF/MIN EACH FLARE 860 SCF/MIN
ANNUAL OPERATING HOURS: 8760

FLARE SYSTEM

Pollutant	No. of Normal Operating Hours per Day	Emission Factor, lbs/mmscf	Number of Normal Operating Hours Per Month	Number of Normal Operating Hours Per Year
NO_X	24.00	13.27	720	8760
CO	24.00	1.19	720	8760
VOC	24.00	1.30	720	8760
PM10	24.00	6.40	720	8760
SO_X	24.00	5.21	720	8760

FLARE SYSTEM

Pollutant	Daily Maximum Emissions (Lbs)	Monthly Maximum Emissions (Lbs)	30-Day Average Emissions (lbs)	Annual PTE (Lbs)	Annual PTE (tons)
NO_X	21.81	654	22	7,961	3.980
CO	1.96	59	2	714	0.357
VOC	2.14	64	2	780	0.390
PM10	10.52	316	11	3,839	1.920
SO_X	8.56	257	9	3,125	1.563

EMISSION INVENTORY FOR THE REGEN FLARE SYSTEM
BIOGAS RENEWABLE GENERATION PROJECT

LFG COMBUSTED: 5 MMBTU/HR
0.0138 MMCF/HR 229.19 SCF/MIN

ANNUAL OPERATING HOURS: 8760

REGEN FLARE SYSTEM

Pollutant	No. of Normal Operating Hours per Day	Emission Factor	Unit of Measurement	Number of Normal Operating Hours Per Month	Number of Normal Operating Hours Per Year
NO_X	24.00	0.025	lbs/mmbtu	720	8760
CO	24.00	0.060	lbs/mmbtu	720	8760
VOC	24.00	0.038	lbs/mmbtu	720	8760
PM10	24.00	6.10	lbs/mmcf	720	8760
SO_X	24.00	10.13	lbs/mmcf	720	8760

REGEN FLARE SYSTEM

Pollutant	Daily Maximum Emissions (Lbs)	Monthly Maximum Emissions (Lbs)	30-Day Average Emissions (lbs)	Annual PTE (Lbs)	Annual PTE (tons)
NO_X	3.00	90	3	1,095	0.548
CO	7.20	216	7	2,628	1.314
VOC	4.56	137	5	1,664	0.832
PM10	2.01	60	2	735	0.367
SO_X	3.34	100	3	1,220	0.610

TOXICS EMISSION INVENTORY

TOXIC EMISSION INVENTORY FOR EMISSION SOURCES
BIOGAS RENEWABLE GENERATION PROJECT

										PROPOSED ENGINES		EXISTING FLARES SYSTEM		PROPOSED REGEN FLARE	
TAC Code	Toxid Air Contaminants (TAC) Compounds	CAS	MW	Conc., ppmv	Data Source	ICE Total Control Efficiency (% wt)[6]	ICE Controlled Emission Rate (lbs/mmscf)	Flare Destruction Efficiency (% wt)[5]	Flare Controlled Emission Rate (lbs/mmscf)	Hourly Emission (lbs/hr)	Yearly Emission (lbs/yr)	Hourly Emission (lbs/hr)	Yearly Emission (lbs/yr)	Hourly Emission (lbs/hr)	Yearly Emission (lbs/yr)
M8	1,1,1 - Trichloroethane	71-55-6	133.41	0.021	Note 1	99.8%	1.17E-05	98%	1.45E-04	3.87E-06	0.0339	9.92E-06	0.0869	1.99E-06	0.0174
T1	1,1,2,2 - Tetrachloroethane	79-34-5	167.85	1.11	Note 2	99.8%	7.75E-04	98%	9.63E-03	2.57E-04	2.2542	6.59E-04	5.7762	1.32E-04	1.1599
E5	1,2 - Dibromoethane	106-93-4	187.86	0.041	Note 1	99.8%	3.20E-05	98%	3.98E-04	1.06E-05	0.0932	2.73E-05	0.2388	5.47E-06	0.0479
D6	1,1 - Dichloroethane	75-34-3	98.97	0.039	Note 1	99.8%	1.61E-05	98%	1.99E-04	5.33E-06	0.0467	1.37E-05	0.1197	2.74E-06	0.0240
V5	1,1 - Dichloroethene	75-35-4	96.94	0.019	Note 1	99.8%	7.66E-06	98%	9.52E-05	2.54E-06	0.0223	6.52E-06	0.0571	1.31E-06	0.0115
E6	1,2 - Dichloroethane	107-06-2	98.96	0.102	Note 1	99.8%	4.20E-05	98%	5.22E-04	1.39E-05	0.1221	3.57E-05	0.3129	7.17E-06	0.0628
	1,2 - Dichloropropane	78-87-5	112.99	0.18	Note 2	99.8%	8.46E-05	98%	1.05E-03	2.81E-05	0.2461	7.20E-05	0.6305	1.45E-05	0.1266
I2	2 - Propanol	67-63-0	60.11	50.1	Note 2	99.7%	2.49E-02	98%	1.56E-01	8.26E-03	72.3533	1.07E-02	93.3648	2.14E-03	18.7479
	Acetonitrile	75-05-8	58.08	0.665	Note 1	99.7%	3.19E-04	98%	2.00E-03	1.06E-04	0.9279	1.37E-04	1.1974	2.74E-05	0.2404
A6	Acrylonitrile	107-31-1	53.06	6.33	Note 2	99.7%	2.77E-03	98%	1.74E-02	9.21E-04	8.0695	1.19E-03	10.4128	2.39E-04	2.0909
A9	Ammonia	7664-41-7	17.03	5	Note 7					2.70E-01	2365.20	0.00E+00	0.0000	0.00E+00	0.0000
B1	Benzene	71-43-2	78.11	1.71	Note 1	99.7%	1.10E-03	98%	6.90E-03	3.66E-04	3.2091	4.73E-04	4.1410	9.49E-05	0.8315
B7	Benzyl chloride	100-44-7	126.58	0.13	Note 1	99.8%	6.85E-05	98%	8.50E-04	2.27E-05	0.1991	5.82E-05	0.5102	1.17E-05	0.1024
C3	Carbon disulfide	75-15-0	76.13	0.58	Note 1	99.7%	3.65E-04	98%	2.28E-03	1.21E-04	1.0609	1.56E-04	1.3689	3.14E-05	0.2749
C5	Carbon tetrachloride	56-23-5	153.84	0.021	Note 1	99.8%	1.34E-05	98%	1.67E-04	4.46E-06	0.0391	1.14E-05	0.1002	2.30E-06	0.0201
	Carbonyl sulfide	463-58-1	60.07	0.49	Note 1	99.7%	2.43E-04	98%	1.52E-03	8.07E-05	0.7072	1.04E-04	0.9125	2.09E-05	0.1832
C10	Chlorobenzene	108-90-7	112.56	0.159	Note 1	99.8%	7.45E-05	98%	9.25E-04	2.47E-05	0.2165	6.33E-05	0.5549	1.27E-05	0.1114
	Chlorodifluoromethane	75-45-6	86.47	1.3	Note 2	99.8%	4.68E-04	98%	5.81E-03	1.55E-04	1.3601	3.98E-04	3.4850	7.99E-05	0.6998
E4	Chloroethane	75-00-3	64.52	1.25	Note 2	99.8%	3.36E-04	98%	4.17E-03	1.11E-04	0.9758	2.85E-04	2.5004	5.73E-05	0.5021
C11	Chloroform	67-66-3	119.39	0.02	Note 1	99.8%	9.93E-06	98%	1.23E-04	3.30E-06	0.0289	8.45E-06	0.0740	1.70E-06	0.0149
	Chloromethane	74-87-3	50.49	1.21	Note 2	99.8%	2.54E-04	98%	3.16E-03	8.44E-05	0.7392	2.16E-04	1.8940	4.34E-05	0.3803
D4	Dichlorobenzene	106-46-7	147	0.82	Note 1	99.8%	5.01E-04	98%	6.23E-03	1.66E-04	1.4584	4.27E-04	3.7371	8.57E-05	0.7504
	Dichlorodifluoromethane	75-71-8	120.91	15.7	Note 2	99.8%	7.90E-03	98%	9.81E-02	2.62E-03	22.9678	6.72E-03	58.8519	1.35E-03	11.8177
	Dichlorofluoromethane	75-43-4	102.92	2.62	Note 2	99.8%	1.12E-03	98%	1.39E-02	3.72E-04	3.2626	9.54E-04	8.3599	1.92E-04	1.6787
M13	Dichloromethane (methylene chloride)	74-87-3	84.94	0.119	Note 1	99.8%	4.21E-05	98%	5.22E-04	1.40E-05	0.1223	3.58E-05	0.3134	7.18E-06	0.0629
P29	Dioxin and Furans	3268-87-9	5.33E-10	lbs/mmcf	Note 8		0.00E+00	0%	5.33E-10	0.00E+00	0.0000	3.65E-11	3.20E-07	7.33E-12	6.42E-08
E3	Ethylbenzene	100-41-4	106.16	2.748	Note 2	99.7%	2.41E-03	98%	1.51E-02	8.00E-04	7.0089	1.03E-03	9.0443	2.07E-04	1.8161
E5	Ethylene dibromide	106-93-4	187.88	0.001	Note 2	99.8%	7.82E-07	98%	9.71E-06	2.59E-07	0.0023	6.65E-07	0.0058	1.34E-07	0.0012
F2	Formaldehyde	50-00-0	NA	NA	Note 4	97.7%	2.97E-02	0%	1.17E+00	9.85E-03	86.2899	8.01E-02	701.2843	1.61E-02	140.8201
	Fluorotrichloromethane	75-69-4	137.38	0.76	Note 2	99.8%	4.34E-04	98%	5.40E-03	1.44E-04	1.2633	3.70E-04	3.2369	7.42E-05	0.6500
H6	Hexane, n-	110-54-3	86.18	6.57	Note 2	99.7%	4.68E-03	98%	2.93E-02	1.55E-03	13.6033	2.00E-03	17.5538	4.02E-04	3.5249
H9	Hydrogen chloride	7647-01-0	36.46	NA	Note 3	NA	5.35E+00	NA	5.35E+00	1.78E+00	15559.5	3.66E-01	3209.5	7.36E-02	644.5
H12	Hydrogen sulfide	7783-06-4	34.08	33.65	Note 1	99.7%	9.47E-03	98%	5.93E-02	3.15E-03	27.5523	4.06E-03	35.5536	8.15E-04	7.1393
M3	Mercury (total)	7439-97-6	200.61	0.00029	Note 2	0.0%	1.51E-04	0%	1.51E-04	5.03E-05	0.4402	1.04E-05	0.0908	2.08E-06	0.0182
M9	Methyl ethyl ketone	78-93-3	72.11	7.09	Note 2	99.7%	4.22E-03	98%	2.64E-02	1.40E-03	12.2833	1.81E-03	15.8504	3.63E-04	3.1828
	Methyl isobutyl ketone	108-10-1	100.16	1.87	Note 2	99.7%	1.55E-03	98%	9.68E-03	5.14E-04	4.5000	6.63E-04	5.8068	6.63E-04	5.8068
P2	Tetrachloroethylene	127-18-4	165.83	0.154	Note 1	99.8%	1.06E-04	98%	1.32E-03	3.53E-05	0.3090	9.04E-05	0.7917	9.04E-05	0.7917
T3	Toluene	108-88-3	92.14	5.436	Note 1	99.7%	4.14E-03	98%	2.59E-02	1.37E-03	12.0338	1.77E-03	15.5284	1.77E-03	15.5284
T8	Trichloroethylene	79-01-6	131.4	0.089	Note 1	99.8%	4.87E-05	98%	6.04E-04	1.62E-05	0.1415	4.14E-05	0.3626	4.14E-05	0.3626
V4	Vinyl chloride	75-01-4	62.5	0.093	Note 1	99.8%	2.42E-05	98%	3.00E-04	8.03E-06	0.0703	2.06E-05	0.1802	2.06E-05	0.1802
X1	Xylenes	1330-20-7	106.16	4.828	Note 1	99.7%	4.23E-03	98%	2.65E-02	1.41E-03	12.3141	1.81E-03	15.8901	1.81E-03	15.8901

Notes:

1. Average analytical results from Scholl Canyon LFG Sampling 2013 - 2016
2. Based on USEPA default value from *AP-42, Table 2.4-1, Default Concentrations for LFG Constituents* .
3. Calculated based on chlorinated compounds in the average samplings and USEPA AP-42 default value, Table 2.4-1
4. Formaldehyde emission factors for tubine and engine are based on the CATEF Clearing house Report; Formaldehyde emission factor for flare is based on SCAQMD AB2588 Supplemental Instruction.
5. 98% Destruction efficiency of NMOC pursuant to SCAQMD rule 1150.1/NSPS Subpart WWW
6. ICE Control efficiency is calculated based on 97.7% control efficiency of catalyst (default value of SCAQMD Rule 1401 Calculator) and 86.1% or 93.0% control efficiency of ICE (USEPA AP-42, Table 2.4-3). The overall control efficiency is calculated as follow: Overall Control Efficiency = 1-(1-CE of catalyst)*(1-CE of ICE).
7. Ammonia emissions occur in operating IC Engines due to SCR. Concentration of ammonia is based on BACT/LAER limit.
8. Emission factor of dioxin and furans is based on the source test conducted on landfill gas combustion in the boiler at Grayson power plant.

EMISSION FACTOR FOR HYDROGEN CHLORIDE EMISSIONS
SCHOLL CANYON LANDFILL GAS FACILITY

Hydrogen Chloride Emission Factor	5.35	lbs/mmcf
Hydrogen Chloride Molecular Weight	36.46	lb/mol

LFG Influent Chlorinated Compound	CAS	No. of Cl Atoms	Concentration, ppmv	Conversion Eff, (%Wt)	HCL Conversion, lb/mmcf
1,1,1 - Trichloroethane	71-55-6	3	0.021	100%	0.005935349
1,1,2,2 - Tetrachloroethane	79-34-5	4	1.11	100%	0.418300775
1,1 - Dichloroethane	75-34-3	2	0.039	100%	0.007348527
1,1 - Dichloroethene	75-35-4	2	0.019	100%	0.003580052
1,2 - Dichloroethane	107-06-2	2	0.102	100%	0.019219225
1,2 - Dichloropropane	78-87-5	2	0.18	100%	0.033916279
Benzyl chloride	100-44-7	1	0.13	100%	0.012247545
Carbon tetrachloride	56-23-5	4	0.021	100%	0.007913798
Chlorobenzene	108-90-7	1	0.159	100%	0.01497969
Chlorodifluoromethane	75-45-6	1	1.3	100%	0.122475452
Chloroethane	75-00-3	1	1.25	100%	0.117764858
Chloroform	67-66-3	3	0.02	100%	0.005652713
Chloromethane	74-87-3	1	1.21	100%	0.113996382
Dichlorobenzene	106-46-7	2	0.82	100%	0.154507494
Dichlorodifluoromethane	75-71-8	2	15.7	100%	2.95825323
Dichlorofluoromethane	75-43-4	2	2.62	100%	0.493670284
Dichloromethane (methylene chloride)	74-87-3	2	0.119	100%	0.022422429
Fluorotrichloromethane	75-69-4	3	0.76	100%	0.214803101
t-1,2-dichloroethene	156-59-2	2	2.84	100%	0.535123514
Tetrachloroethylene	127-18-4	4	0.154	100%	0.058034522
Trichloroethylene	79-01-6	3	0.089	100%	0.025154574
Vinyl chloride	75-01-4	1	0.093	100%	0.008761705

Errata Attachment B: Updated Project Air Quality Model Input / Output

MODELING INPUT INFORMATION

Point Sources - 1 Hour Model

Model ID	Source Description	UTME (m)	UTMN (m)	Elevation (m)	Stack Height (m)	Temperature (K)	Exit Velocity (m/s)	Stack Dia. (m)	NOx Emission (g/s)	CO Emission (g/s)	SO2 Emission (g/s)	PM Emission (g/s)
ENGINE1	Generator 1	390140.0	3779830.2	436.27	12.192	698.150	32.504	0.6096	3.94968	7.10960	0.10584	
ENGINE2	Generator 2	390147.2	3779828.8	437.82	12.192	698.150	32.504	0.6096	0.15372	1.10878	0.10584	
ENGINE3	Generator 3	390154.5	3779827.5	440.51	12.192	698.150	32.504	0.6096	0.15372	1.10878	0.10584	
ENGINE4	Generator 4	390161.7	3779827.4	443.05	12.192	698.150	32.504	0.6096	0.15372	1.10878	0.10584	
REGEN	Regen Flare	390047.3	3779809.2	429.86	8.534	1033.150	3.359	1.2192	0.01575	0.03780	0.01755	
FLARE12	Existing Flare 12	390039.6	3779808.2	429.97	4.877	1051.210	2.243	2.4384	0.11450	0.01027	0.04495	

Point Sources - 3 Hour Model

Model ID	Source Description	UTME (m)	UTMN (m)	Elevation (m)	Stack Height (m)	Temperature (K)	Exit Velocity (m/s)	Stack Dia. (m)	NOx Emission (g/s)	CO Emission (g/s)	SO2 Emission (g/s)	PM Emission (g/s)
ENGINE1	Generator 1	390140.0	3779830.2	439.40	12.192	698.150	32.504	0.6096			0.10584	
ENGINE2	Generator 2	390147.2	3779828.8	439.40	12.192	698.150	32.504	0.6096			0.10584	
ENGINE3	Generator 3	390154.5	3779827.5	439.40	12.192	698.150	32.504	0.6096			0.10584	
ENGINE4	Generator 4	390161.7	3779827.4	439.40	12.192	698.150	32.504	0.6096			0.10584	
REGEN	Regen Flare	390047.3	3779809.2	429.86	8.534	1033.150	3.359	1.2192			0.01755	
FLARE12	Existing Flare 12	390039.6	3779808.2	429.97	4.877	1051.210	2.243	2.4384			0.04495	

Point Sources - 8 Hour Model

Model ID	Source Description	UTME (m)	UTMN (m)	Elevation (m)	Stack Height (m)	Temperature (K)	Exit Velocity (m/s)	Stack Dia. (m)	NOx Emission (g/s)	CO Emission (g/s)	SO2 Emission (g/s)	PM Emission (g/s)
ENGINE1	Generator 1	390140.0	3779830.2	439.40	12.192	698.150	32.504	0.6096		3.37631		
ENGINE2	Generator 2	390147.2	3779828.8	439.40	12.192	698.150	32.504	0.6096		1.10878		
ENGINE3	Generator 3	390154.5	3779827.5	439.40	12.192	698.150	32.504	0.6096		1.10878		
ENGINE4	Generator 4	390161.7	3779827.4	439.40	12.192	698.150	32.504	0.6096		1.10878		
REGEN	Regen Flare	390047.3	3779809.2	429.86	8.534	1033.150	3.359	1.2192		0.03780		
FLARE12	Existing Flare 12	390039.6	3779808.2	429.97	4.877	1051.210	2.243	2.4384		0.01027		

Point Sources - 24 Hour Model

Model ID	Source Description	UTME (m)	UTMN (m)	Elevation (m)	Stack Height (m)	Temperature (K)	Exit Velocity (m/s)	Stack Dia. (m)	NOx Emission (g/s)	CO Emission (g/s)	SO2 Emission (g/s)	PM Emission (g/s)
ENGINE1	Generator 1	390140.0	3779830.2	439.40	12.192	698.150	32.504	0.6096			0.10584	0.07669
ENGINE2	Generator 2	390147.2	3779828.8	439.40	12.192	698.150	32.504	0.6096			0.10584	0.07669
ENGINE3	Generator 3	390154.5	3779827.5	439.40	12.192	698.150	32.504	0.6096			0.10584	0.07669
ENGINE4	Generator 4	390161.7	3779827.4	439.40	12.192	698.150	32.504	0.6096			0.10584	0.07669
REGEN	Regen Flare	390047.3	3779809.2	429.86	8.534	1033.150	3.359	1.2192			0.01755	0.01057
FLARE12	Existing Flare 12	390039.6	3779808.2	429.97	4.877	1051.210	2.243	2.4384			0.04495	0.05522

Point Sources - Annual Model

Model ID	Source Description	UTME (m)	UTMN (m)	Elevation (m)	Stack Height (m)	Temperature (K)	Exit Velocity (m/s)	Stack Dia. (m)	NOx Emission (g/s)	CO Emission (g/s)	SO2 Emission (g/s)	PM Emission (g/s)
ENGINE1	Generator 1	390140.0	3779830.2	439.40	12.192	698.150	32.504	0.6096	0.20660		0.10584	0.07669
ENGINE2	Generator 2	390147.2	3779828.8	439.40	12.192	698.150	32.504	0.6096	0.20660		0.10584	0.07669
ENGINE3	Generator 3	390154.5	3779827.5	439.40	12.192	698.150	32.504	0.6096	0.20660		0.10584	0.07669
ENGINE4	Generator 4	390161.7	3779827.4	439.40	12.192	698.150	32.504	0.6096	0.20660		0.10584	0.07669
REGEN	Regen Flare	390047.3	3779809.2	429.86	8.534	1033.150	3.359	1.2192	0.01575		0.01755	0.01057
FLARE12	Existing Flare 12	390039.6	3779808.2	429.97	4.877	1051.210	2.243	2.4384	0.11450		0.04495	0.05522

AQIA RESULTS
(SHORT-TERM & ANNUAL)

Description	Pollutant	Averaging Period	Highest	Source Group	Conc (ug/m3)	UTME	UTMN	Conc Date mm/dd/yy/hh	Conc (ppm)	Background	Unit	Total	Unit	NAAQS	Unit	SCAQMD	Unit
CO State Standard/NAAQS																	
Scholl Canyon CO ICE 1hr Model	CO	1-HR	1ST	ALL	192.31	390407.0	3779876.0	04/25/14/20	0.17476	2.6	PPM	2.7748	PPM	35	PPM	20	PPM
				ENGINE1	128.87	390407.0	3779876.0	04/25/14/20	0.11712			2.7171	PPM				
				ENGINE2	20.48	390407.0	3779876.0	04/25/14/20	0.01861			2.6186	PPM				
				ENGINE3	20.84	390407.0	3779876.0	04/25/14/20	0.01894			2.6189	PPM				
				ENGINE4	21.31	390407.0	3779876.0	04/25/14/20	0.01937			2.6194	PPM				
				REGEN	0.85	390419.6	3779834.2	12/12/15/04	0.00077			2.6008	PPM				
				FLARE12	0.21	390419.6	3779834.2	04/13/12/18	0.00019			2.6002	PPM				
Scholl Canyon CO ICE 8hr Model	CO	8-HR	1ST	ALL	52.05	390419.6	3779834.2	03/06/16/16	0.04731	1.6	PPM	1.6473	PPM	9	PPM	9	PPM
				ENGINE1	25.23	390419.6	3779834.2	03/06/16/16	0.02293			1.6229	PPM				
				ENGINE2	8.52	390419.6	3779834.2	03/06/16/16	0.00774			1.6077	PPM				
				ENGINE3	8.75	390419.6	3779834.2	03/06/16/16	0.00796			1.6080	PPM				
				ENGINE4	9.41	390419.6	3779834.2	03/18/12/16	0.00855			1.6086	PPM				
				REGEN	0.49	389664.0	3779939.0	05/25/12/24	0.00045			1.6004	PPM				
				FLARE12	0.11	390067.2	3779358.3	03/07/12/08	0.00010			1.6001	PPM				
NO_2 State Standard - ARM2																	
Scholl Canyon NO2 ICE 1hr Model	NO2	1-HR	1ST	ALL	66.93	390407.0	3779876.0	5 YEARS	0.03702	0.0719	PPM	0.1089	PPM		PPM	0.18	PPM
				ENGINE1	58.09	390407.0	3779876.0	5 YEARS	0.03213			0.1040	PPM				
				ENGINE2	2.31	390407.0	3779876.0	5 YEARS	0.00128			0.0732	PPM				
				ENGINE3	2.37	390407.0	3779876.0	5 YEARS	0.00131			0.0732	PPM				
				ENGINE4	2.43	390407.0	3779876.0	5 YEARS	0.00135			0.0732	PPM				
				REGEN	0.30	390419.6	3779834.2	5 YEARS	0.00017			0.0721	PPM				
				FLARE12	1.85	390432.2	3779792.4	5 YEARS	0.00102			0.0729	PPM				
NO_2 NAAQS - ARM2																	
Scholl Canyon NO2 ICE 1hr Model	NO2	8TH-HIGHEST MAX DAILY 1-HR	1ST	ALL	37.65	390407.0	3779876.0	5 YEARS	0.02083	0.0593	PPM	0.0801	PPM	0.10	PPM		PPM
				ENGINE1	32.77	390407.0	3779876.0	5 YEARS	0.01813			0.0774	PPM				
				ENGINE2	1.30	390407.0	3779876.0	5 YEARS	0.00072			0.0600	PPM				
				ENGINE3	1.33	390407.0	3779876.0	5 YEARS	0.00074			0.0600	PPM				
				ENGINE4	1.38	390407.0	3779876.0	5 YEARS	0.00076			0.0601	PPM				
				REGEN	0.24	389646.5	3779975.3	5 YEARS	0.00013			0.0594	PPM				
				FLARE12	1.37	390212.1	3779354.5	5 YEARS	0.00076			0.0601	PPM				
PM10/PM2.5 State Standard																	
Scholl Canyon PM ICE 24hr Model	PM10/PM2.5	24-HR	1ST	ALL	1.373	390260.5	3779353.2	12/25/2014				1.373	UG/M3		UG/M3	Threshold PM10 - 2.5 PM2.5 - 2.5	UG/M3
				ENGINE1	0.276	390308.8	3779351.9	12/25/2014				0.276	UG/M4				
				ENGINE2	0.282	390438.3	3779909.3	3/26/2014				0.282	UG/M5				
				ENGINE3	0.290	390438.3	3779909.3	3/26/2014				0.290	UG/M6				
				ENGINE4	0.299	390438.3	3779909.3	3/26/2014				0.299	UG/M7				
				REGEN	0.066	390308.8	3779351.9	12/14/2015				0.066	UG/M8				
				FLARE12	0.269	390212.1	3779354.5	12/25/2014				0.269	UG/M9				
PM10 NAAQS Standard																	
Scholl Canyon PM ICE 24hr Model	PM10	24-HR	6TH	ALL	1.046	390350.0	3779350.0	1/11/2013		96	UG/M3	97.05	UG/M3	150	UG/M3		UG/M3
				ENGINE1	0.214	390357.1	3779350.6	1/11/2013				96.21	UG/M4				
				ENGINE2	0.215	390357.1	3779350.6	11/16/2015				96.22	UG/M5				
				ENGINE3	0.211	390357.1	3779350.6	11/16/2015				96.21	UG/M6				
				ENGINE4	0.206	390357.1	3779350.6	11/16/2015				96.21	UG/M7				
				REGEN	0.050	390260.5	3779353.2	1/28/2013				96.05	UG/M8				
				FLARE12	0.205	390250.0	3779350.0	1/11/2013				96.20	UG/M9				
PM2.5 NAAQS Standard																	
Scholl Canyon PM ICE 24hr Model	PM2.5	24-HR	8TH	ALL	0.956	390308.8	3779351.9	12/24/2016		30.5	UG/M3	31.46	UG/M3	35	UG/M3		UG/M3
				ENGINE1	0.192	390357.1	3779350.6	2/20/2013				30.69	UG/M4				
				ENGINE2	0.189	390357.1	3779350.6	2/20/2013				30.69	UG/M5				
				ENGINE3	0.189	390350.0	3779350.0	12/24/2016				30.69	UG/M6				
				ENGINE4	0.189	390350.0	3779350.0	12/24/2016				30.69	UG/M7				
				REGEN	0.048	390300.0	3779350.0	12/23/2015				30.55	UG/M8				
				FLARE12	0.191	390260.5	3779353.2	12/24/2016				30.69	UG/M9				

Description	Pollutant	Averaging Period	Highest	Source Group	Conc (ug/m3)	UTME	UTMN	Conc Date mm/dd/yy/hh	Conc (ppm)	Background	Unit	Total	Unit	NAAQS	Unit	SCAQMD	Unit
SO_2 State Standard																	
Scholl Canyon SO2 ICE 1hr Model	SO2	1-HR	1ST	ALL	8.10	390407.0	3779876.0	5 YEARS	0.00322	0.018	PPM	0.0212	PPM	0.075	PPM	0.25	PPM
				ENGINE1	1.73	390407.0	3779876.0	5 YEARS	0.00069			0.0187	PPM				
				ENGINE2	1.76	390407.0	3779876.0	5 YEARS	0.00070			0.0187	PPM				
				ENGINE3	1.81	390407.0	3779876.0	5 YEARS	0.00072			0.0187	PPM				
				ENGINE4	1.86	390407.0	3779876.0	5 YEARS	0.00074			0.0187	PPM				
				REGEN	0.37	390419.6	3779834.2	5 YEARS	0.00015			0.0181	PPM				
				FLARE12	0.80	390432.2	3779792.4	5 YEARS	0.00032			0.0183	PPM				
Scholl Canyon SO2 ICE 3hr Model	SO2	3-HR	1ST	ALL	6.87	390438.3	3779909.3	03/26/14/21	0.00273	0.002	PPM	0.0047	PPM	0.075	PPM	0.04	PPM
				ENGINE1	1.46	390438.3	3779909.3	03/26/14/21	0.00058			0.0026	PPM				
				ENGINE2	1.53	390438.3	3779909.3	03/26/14/21	0.00061			0.0026	PPM				
				ENGINE3	1.59	390438.3	3779909.3	03/26/14/21	0.00063			0.0026	PPM				
				ENGINE4	1.65	390438.3	3779909.3	03/26/14/21	0.00066			0.0027	PPM				
				REGEN	0.33	389664.0	3779939.0	08/30/16/21	0.00013			0.0021	PPM				
				FLARE12	0.65	390018.9	3779359.6	04/18/13/03	0.00026			0.0023	PPM				
Scholl Canyon SO2 ICE 24hr Model	SO2	24-HR	1ST	ALL	1.77	390300.0	3779350.0	12/25/2014	0.00071	0.002	PPM	0.0027	PPM	0.5	PPM	0.04	PPM
				ENGINE1	0.38	390308.8	3779351.9	12/25/2014	0.00015			0.0022	PPM				
				ENGINE2	0.39	390438.3	3779909.3	3/26/2014	0.00015			0.0022	PPM				
				ENGINE3	0.40	390438.3	3779909.3	3/26/2014	0.00016			0.0022	PPM				
				ENGINE4	0.41	390438.3	3779909.3	3/26/2014	0.00016			0.0022	PPM				
				REGEN	0.11	390308.8	3779351.9	12/14/2015	0.00004			0.0020	PPM				
				FLARE12	0.22	390212.1	3779354.5	12/25/2014	0.00009			0.0021	PPM				
SO_2 NAAQS																	
Scholl Canyon SO2 ICE 1hr Model	SO2	4TH-HIGHEST MAX DAILY 1-HR	4TH	ALL	5.77	390407.0	3779876.0	5 YEARS	0.00229	0.0094	PPM	0.0117	PPM	0.075	PPM		PPM
				ENGINE1	1.25	390407.0	3779876.0	5 YEARS	0.00050			0.0099	PPM				
				ENGINE2	1.27	390407.0	3779876.0	5 YEARS	0.00051			0.0099	PPM				
				ENGINE3	1.28	390407.0	3779876.0	5 YEARS	0.00051			0.0099	PPM				
				ENGINE4	1.31	390407.0	3779876.0	5 YEARS	0.00052			0.0099	PPM				
				REGEN	0.32	389664.0	3779939.0	5 YEARS	0.00013			0.0095	PPM				
				FLARE12	0.65	390163.8	3779355.7	5 YEARS	0.00026			0.0097	PPM				

CO 1 Hour NAAQS = Not to be exceeded more than once per year. Design values based on highest 1 hour model result over 5 years and highest 1 hour monitored background 2017 - 2019.

CO 1 Hour SCAQMD = Not to be exceeded. Design values based on highest 1 hour model result over 5 years and highest 1 hour monitored background 2017 - 2019.

CO 8 Hour NAAQS = Not to be exceeded more than once per year. Design values based on highest 8 hour model result over 5 years and highest 8 hour monitored background 2017 - 2019.

CO 8 Hour SCAQMD = Not to be exceeded. Design values based on highest 8 hour model result over 5 years and highest 8 hour monitored background 2017 - 2019.

NO2 1 Hour NAAQS = 98th percentile of 1-hour daily maximum concentrations, averaged over 3 years (approx 8th highest). Design value based on 98th percentile of 1-hour daily maximum concentrations, averaged over 5 years and the highest 98th percentile monitored concentration for years 2017-2019.

NO2 1 Hour SCAQMD = Not to be exceeded. Design values based on highest 1 hour model result over 5 years and highest 1 hour monitored background 2017 - 2019.

PM10/PM2.5 24 Hour SCAQMD = Not to exceeded significant threshold. Design value based on 1st highest max 5 year model result.

PM10 24 Hour NAAQS = Not to be exceeded more than once per year on average over 3 years (2nd Highest). Design value based on 6th highest max 5 year model result and highest monitored background 2017-2019.

PM2.5 24 Hour NAAQS = 98th percentile, averaged over 3 years (8th highest not including secondary). Design value based on 98th percentile, averaged over 5 years, and the highest 98th percentile 24 hour monitored background 2017 - 2019. No secondary emissions included.

SO2 1 Hour NAAQS = 99th percentile of 1-hour daily maximum concentrations, averaged over 3 years (approx 4th highest). Design value based on 99th percentile of 1-hour daily maximum concentrations, averaged over 5 years and the highest 99th percentile 1 hour monitored background 2017 - 2019.

SO2 1 Hour SCAQMD = Not to be exceeded. Design values based on highest 1 hour model result over 5 years and highest 1 hour monitored background 2017 - 2019.

SO2 24 Hour SCAQMD = Not to be exceeded. Design values based on highest 24 hour model result over 5 years and highest 24 hour monitored background 2017 - 2019.

Description	Pollutant	Averaging Period	Highest	Source Group	Conc (ug/m3)	UTME	UTMN	Conc Date	Conc (ppm)	Background	Unit	Total	Unit	NAAQS	Unit	SCAQMD	Unit
NO_2 State Standard/NAAQS Normal Operations - ARM																	
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	ALL	0.411	389950.0	3780650.0	2012	0.00023	0.0154	PPM	0.0156	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	ALL	0.418	389950.0	3780650.0	2013	0.00023			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	ALL	0.444	389950.0	3780650.0	2014	0.00025			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	ALL	0.413	389950.0	3780650.0	2015	0.00023			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	ALL	0.440	389950.0	3780650.0	2016	0.00024			0.0156	PPM				
								5 Year Max	**0.00025**			**0.0156**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	ENGINE1	0.090	389950.0	3780650.0	2012	0.000050	0.0154	PPM	0.0154	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	ENGINE1	0.091	389950.0	3780650.0	2013	0.000051			0.0155	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	ENGINE1	0.097	389950.0	3780650.0	2014	0.000054			0.0155	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	ENGINE1	0.091	389950.0	3780650.0	2015	0.000050			0.0155	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	ENGINE1	0.097	389950.0	3780650.0	2016	0.000053			0.0155	PPM				
								5 Year Max	**0.000054**			**0.0155**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	ENGINE2	0.089	389950.0	3780650.0	2012	0.000049	0.0154	PPM	0.0154	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	ENGINE2	0.090	389950.0	3780650.0	2013	0.000050			0.0155	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	ENGINE2	0.096	389950.0	3780650.0	2014	0.000053			0.0155	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	ENGINE2	0.089	389950.0	3780650.0	2015	0.000049			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	ENGINE2	0.095	389950.0	3780650.0	2016	0.000053			0.0155	PPM				
								5 Year Max	**0.000053**			**0.0155**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	ENGINE3	0.088	389950.0	3780650.0	2012	0.000049	0.0154	PPM	0.0154	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	ENGINE3	0.089	389950.0	3780650.0	2013	0.000049			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	ENGINE3	0.095	389950.0	3780650.0	2014	0.000053			0.0155	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	ENGINE3	0.088	389950.0	3780650.0	2015	0.000049			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	ENGINE3	0.094	389950.0	3780650.0	2016	0.000052			0.0155	PPM				
								5 Year Max	**0.000053**			**0.0155**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	ENGINE4	0.087	389950.0	3780650.0	2012	0.000048	0.0154	PPM	0.0154	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	ENGINE4	0.088	389950.0	3780650.0	2013	0.000049			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	ENGINE4	0.094	389950.0	3780650.0	2014	0.000052			0.0155	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	ENGINE4	0.087	389950.0	3780650.0	2015	0.000048			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	ENGINE4	0.093	389950.0	3780650.0	2016	0.000051			0.0155	PPM				
								5 Year Max	**0.000052**			**0.0155**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	REGEN	0.012	389918.0	3780577.0	2012	0.0000066	0.0154	PPM	0.0154	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	REGEN	0.012	389918.0	3780577.0	2013	0.0000067			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	REGEN	0.013	389918.0	3780577.0	2014	0.0000071			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	REGEN	0.012	389918.0	3780577.0	2015	0.0000067			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	REGEN	0.013	389918.0	3780577.0	2016	0.0000071			0.0154	PPM				
								5 Year Max	**0.000007**			**0.0154**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	FLARE12	0.049	389940.0	3780593.5	2012	0.000027	0.0154	PPM	0.0154	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	FLARE12	0.050	389940.0	3780593.5	2013	0.000028			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	FLARE12	0.053	389940.0	3780593.5	2014	0.000029			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	FLARE12	0.049	389940.0	3780593.5	2015	0.000027			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	FLARE12	0.054	389940.0	3780593.5	2016	0.000030			0.0154	PPM				
								5 Year Max	**0.000030**			**0.0154**	**PPM**				

Description	Pollutant	Averaging Period	Highest	Source Group	Conc (ug/m3)	UTME	UTMN	Conc Date	Conc (ppm)	Background	Unit	Total	Unit	NAAQS	Unit	SCAQMD	Unit
PM10/PM2.5 State Standard Normal																	
Scholl Canyon ICE AnnualElevation_2008_PM	PM10, PM2.5	ANNUAL	1ST	ALL	0.179	389950.0	3780650.0	2012				0.179	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE AnnualElevation_2009_PM	PM10, PM2.5	ANNUAL	1ST	ALL	0.182	389950.0	3780650.0	2013				0.182	UG/M3				
Scholl Canyon ICE AnnualElevation_2010_PM	PM10, PM2.5	ANNUAL	1ST	ALL	0.193	389950.0	3780650.0	2014				0.193	UG/M3				
Scholl Canyon ICE AnnualElevation_2011_PM	PM10, PM2.5	ANNUAL	1ST	ALL	0.180	389950.0	3780650.0	2015				0.180	UG/M3				
Scholl Canyon ICE AnnualElevation_2012_PM	PM10, PM2.5	ANNUAL	1ST	ALL	0.192	389962.0	3780610.0	2016				0.192	UG/M3				
				5 Year Average	**0.185**							**0.185**	**UG/M3**				
Scholl Canyon ICE Annual_2008_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE1	0.037	389950.0	3780650.0	2012				0.0372	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE Annual_2009_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE1	0.038	389950.0	3780650.0	2013				0.0377	UG/M3				
Scholl Canyon ICE Annual_2010_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE1	0.040	389950.0	3780650.0	2014				0.0402	UG/M3				
Scholl Canyon ICE Annual_2011_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE1	0.037	389950.0	3780650.0	2015				0.0374	UG/M3				
Scholl Canyon ICE Annual_2012_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE1	0.040	389950.0	3780650.0	2016				0.0398	UG/M3				
				5 Year Average	**0.038**							**0.0385**	**UG/M3**				
Scholl Canyon ICE Annual_2008_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE2	0.037	389950.0	3780650.0	2012				0.0368	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE Annual_2009_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE2	0.037	389950.0	3780650.0	2013				0.0373	UG/M3				
Scholl Canyon ICE Annual_2010_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE2	0.040	389950.0	3780650.0	2014				0.0397	UG/M3				
Scholl Canyon ICE Annual_2011_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE2	0.037	389950.0	3780650.0	2015				0.0369	UG/M3				
Scholl Canyon ICE Annual_2012_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE2	0.039	389950.0	3780650.0	2016				0.0393	UG/M3				
				5 Year Average	**0.038**							**0.0380**	**UG/M3**				
Scholl Canyon ICE AnnualElevation_2008_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE3	0.036	389950.0	3780650.0	2012				0.036	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE AnnualElevation_2009_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE3	0.037	389950.0	3780650.0	2013				0.037	UG/M3				
Scholl Canyon ICE AnnualElevation_2010_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE3	0.039	389950.0	3780650.0	2014				0.039	UG/M3				
Scholl Canyon ICE AnnualElevation_2011_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE3	0.036	389950.0	3780650.0	2015				0.036	UG/M3				
Scholl Canyon ICE AnnualElevation_2012_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE3	0.039	389950.0	3780650.0	2016				0.039	UG/M3				
				5 Year Average	**0.038**							**0.038**	**UG/M3**				
Scholl Canyon ICE AnnualElevation_2008_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE4	0.036	389950.0	3780650.0	2012				0.036	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE AnnualElevation_2009_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE4	0.036	389950.0	3780650.0	2013				0.036	UG/M3				
Scholl Canyon ICE AnnualElevation_2010_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE4	0.039	389950.0	3780650.0	2014				0.039	UG/M3				
Scholl Canyon ICE AnnualElevation_2011_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE4	0.036	389950.0	3780650.0	2015				0.036	UG/M3				
Scholl Canyon ICE AnnualElevation_2012_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE4	0.038	389950.0	3780650.0	2016				0.038	UG/M3				
				5 Year Average	**0.037**							**0.037**	**UG/M3**				
Scholl Canyon ICE AnnualElevation_2008_PM	PM10, PM2.5	ANNUAL	1ST	REGEN	0.009	389918.0	3780577.0	2012				0.009	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE AnnualElevation_2009_PM	PM10, PM2.5	ANNUAL	1ST	REGEN	0.009	389918.0	3780577.0	2013				0.009	UG/M3				
Scholl Canyon ICE AnnualElevation_2010_PM	PM10, PM2.5	ANNUAL	1ST	REGEN	0.010	389918.0	3780577.0	2014				0.010	UG/M3				
Scholl Canyon ICE AnnualElevation_2011_PM	PM10, PM2.5	ANNUAL	1ST	REGEN	0.009	389918.0	3780577.0	2015				0.009	UG/M3				
Scholl Canyon ICE AnnualElevation_2012_PM	PM10, PM2.5	ANNUAL	1ST	REGEN	0.010	389918.0	3780577.0	2016				0.010	UG/M3				
				5 Year Average	**0.009**							**0.009**	**UG/M3**				
Scholl Canyon ICE AnnualElevation_2008_PM	PM10, PM2.5	ANNUAL	1ST	FLARE12	0.026	389940.0	3780593.5	2012				0.026	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE AnnualElevation_2009_PM	PM10, PM2.5	ANNUAL	1ST	FLARE12	0.027	389940.0	3780593.5	2013				0.027	UG/M3				
Scholl Canyon ICE AnnualElevation_2010_PM	PM10, PM2.5	ANNUAL	1ST	FLARE12	0.028	389940.0	3780593.5	2014				0.028	UG/M3				
Scholl Canyon ICE AnnualElevation_2011_PM	PM10, PM2.5	ANNUAL	1ST	FLARE12	0.026	389940.0	3780593.5	2015				0.026	UG/M3				
Scholl Canyon ICE AnnualElevation_2012_PM	PM10, PM2.5	ANNUAL	1ST	FLARE12	0.029	389940.0	3780593.5	2016				0.029	UG/M3				
				5 Year Average	**0.027**							**0.027**	**UG/M3**				

NO2 Annual NAAQS = Annual mean. Design value based on highest annual mean over 5 years of model result and highest annual monitored background 2017 - 2019. ARM Method = 80% of model results.

PM10/PM2.5 Annual SCAQMD = Not to exceeded significant threshold. Design value based on the 5 year average of annual mean model result.

PM Annual NAAQS = Equal to the annual mean averaged over 3 years. Design value based on the 5 year average of annual mean model result and highest annual monitored background 2017 - 2019.

SITE MAPS SHOWING THE LOCATIONS OF MODELING RESULTS

AERMOD Output for 1st highest 1-Hourly NO_2 Concentrations (in ppm)



AERMOD Output for 8th highest 1-hourly NO2 Concentrations (ppm)



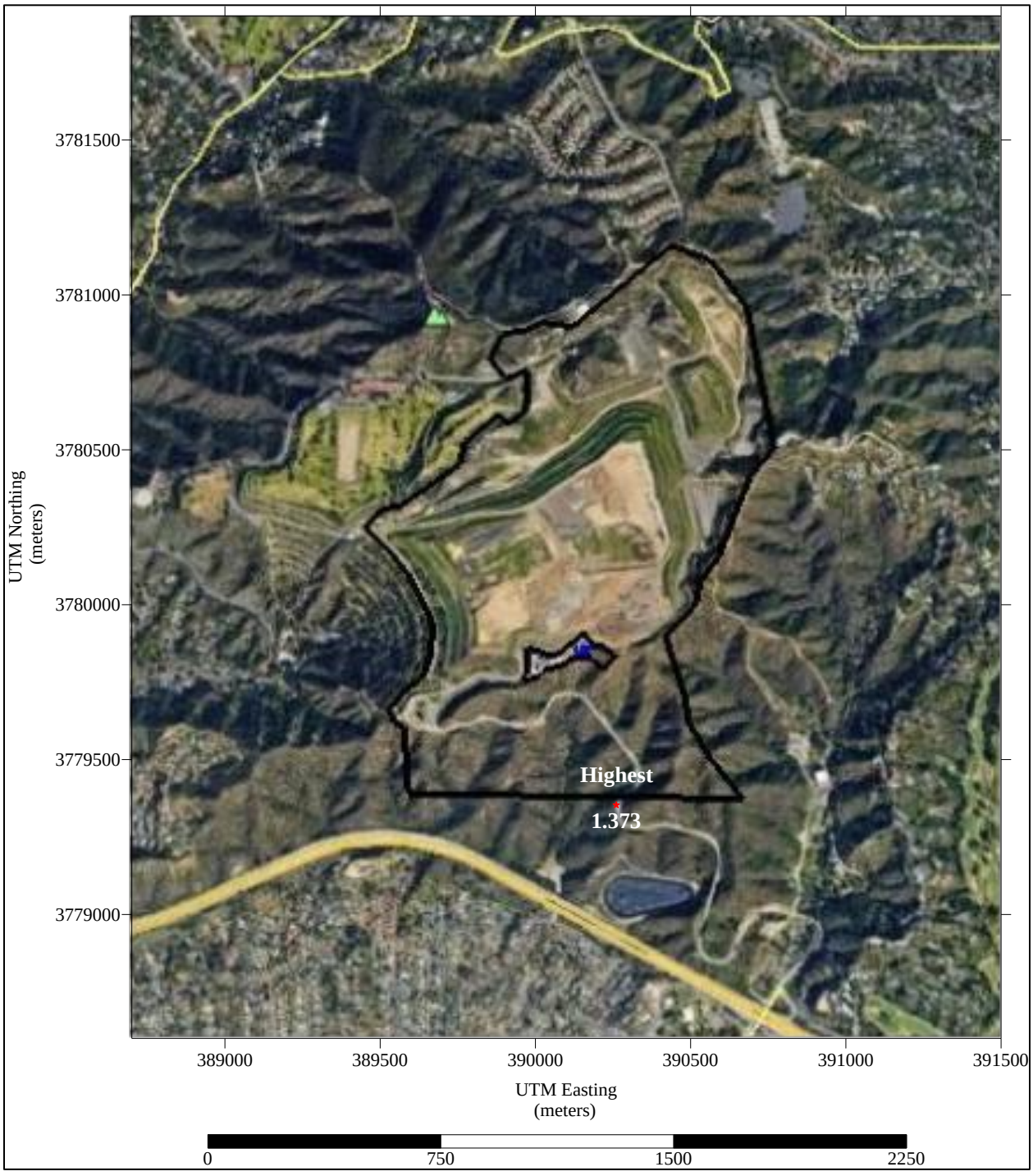
AERMOD Output for Annual NO_2 Concentrations (in ppm)



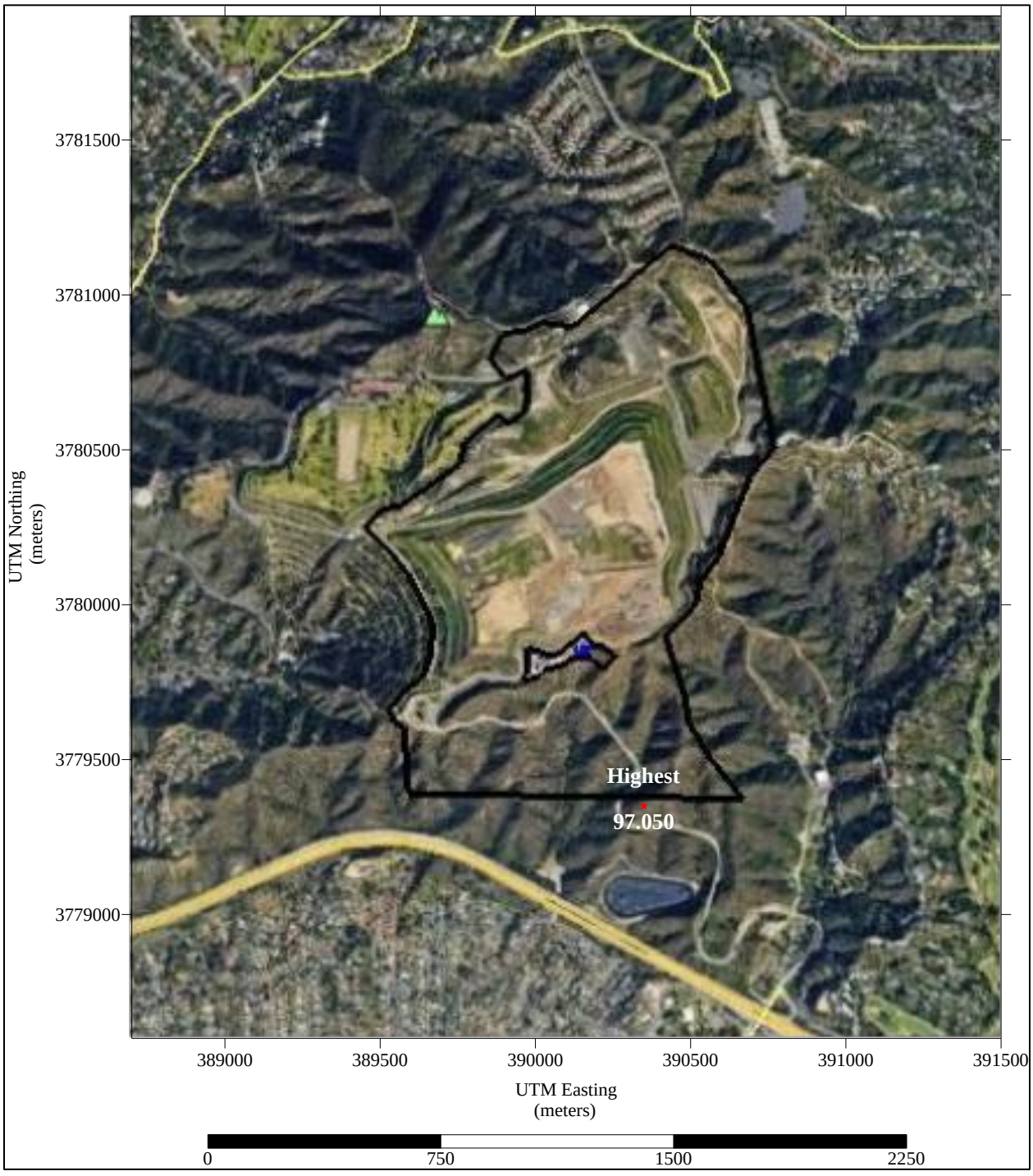
AERMOD Output for 1st Highest 1-Hourly and 8-Hourly CO Concentrations (in ppm)



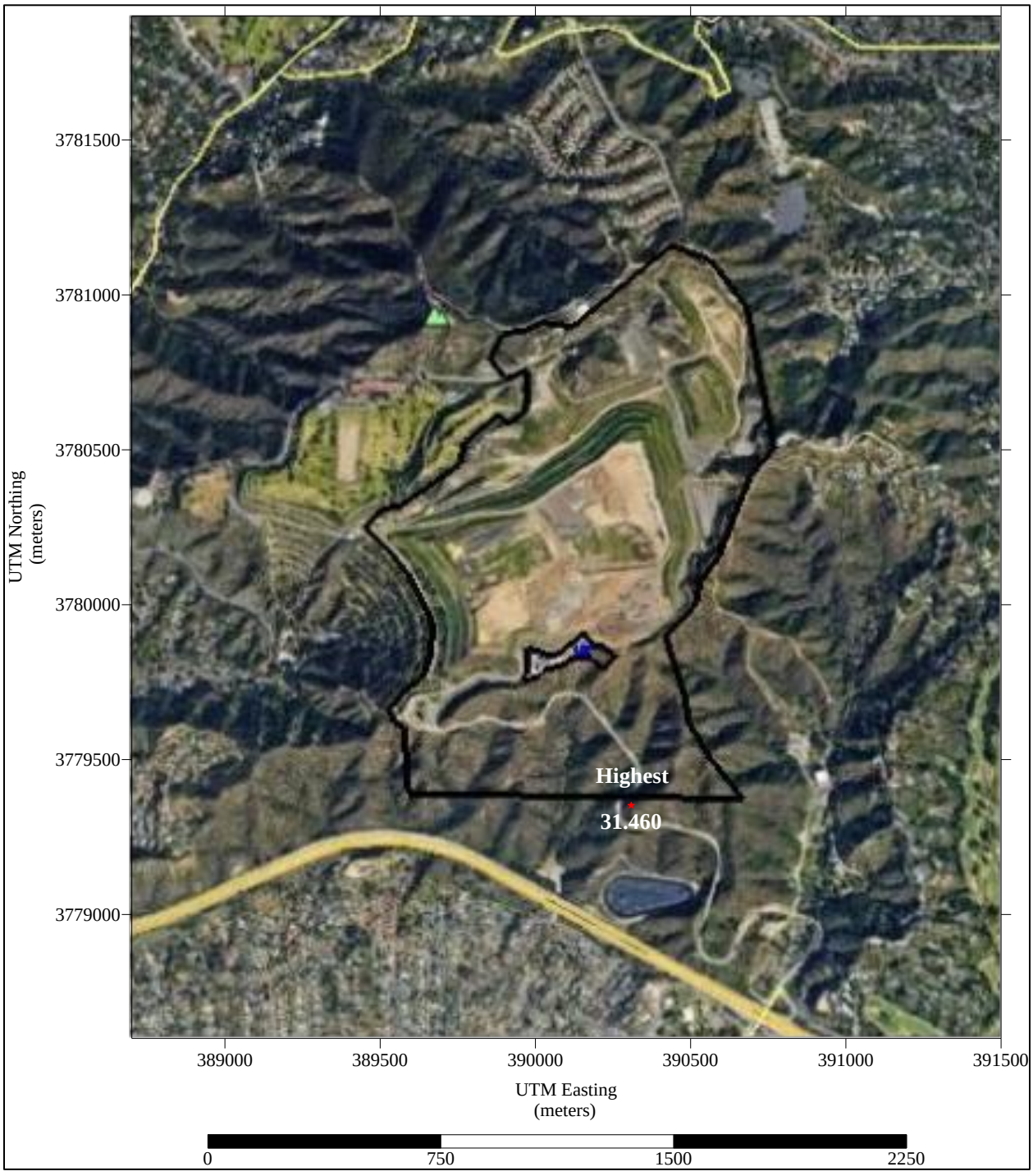
AERMOD Output for 1st Highest 24-hour PM10 Concentrations (µg/m³)



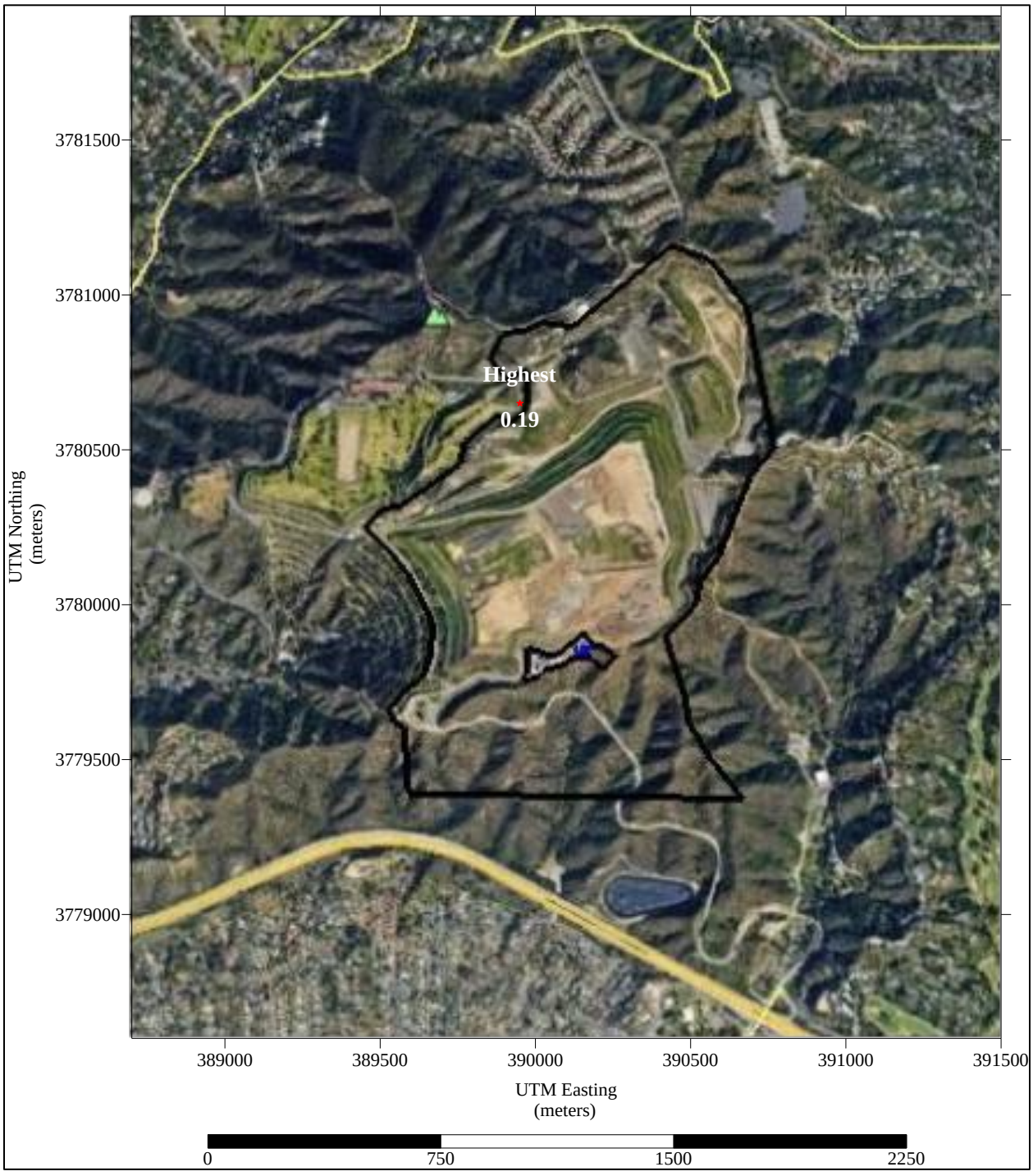
AERMOD Output for 6th Highest 24-hour PM10 Concentrations (µg/m³)



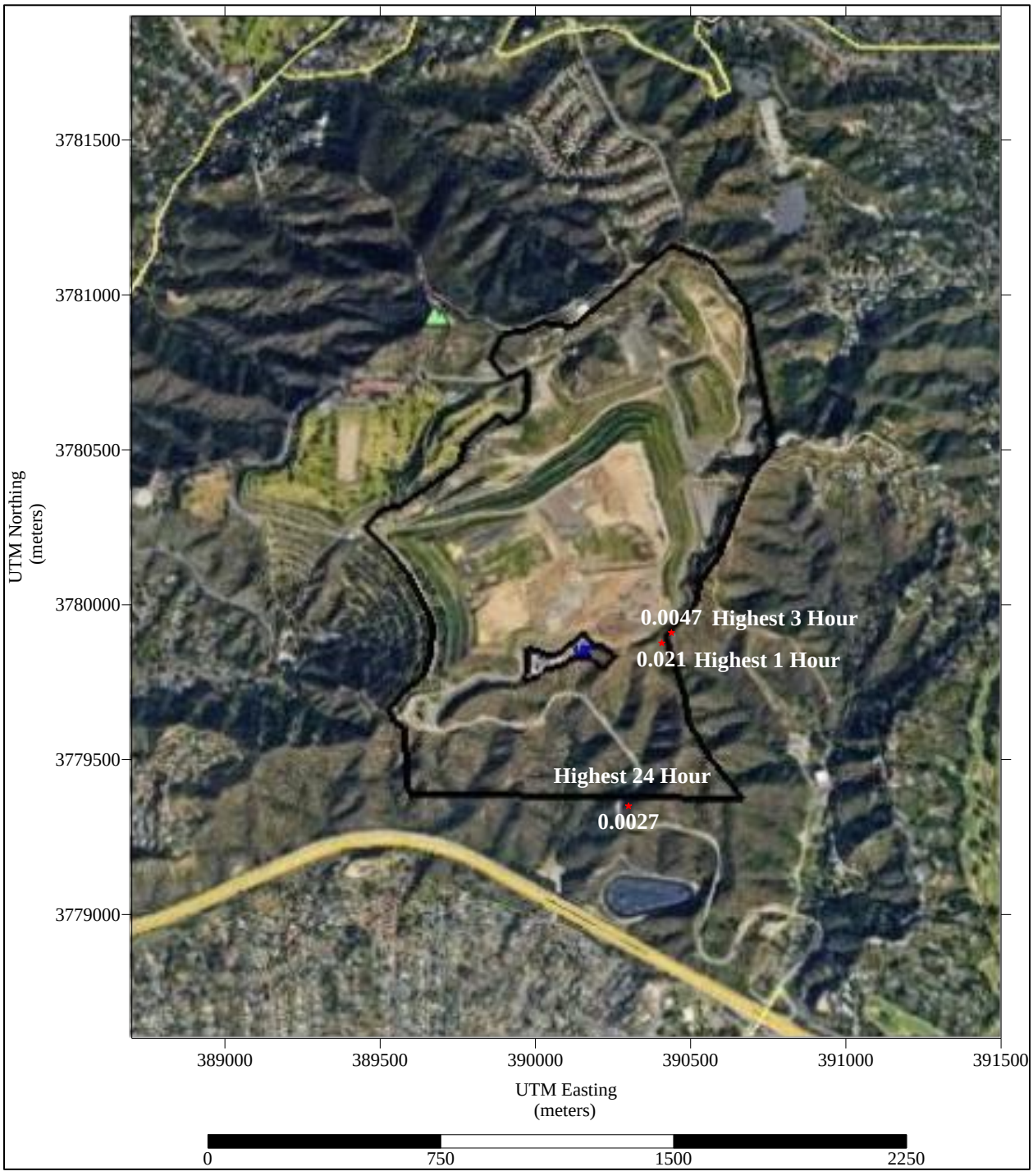
AERMOD Output for 8th Highest 24-hour PM2.5 Concentrations (µg/m³)



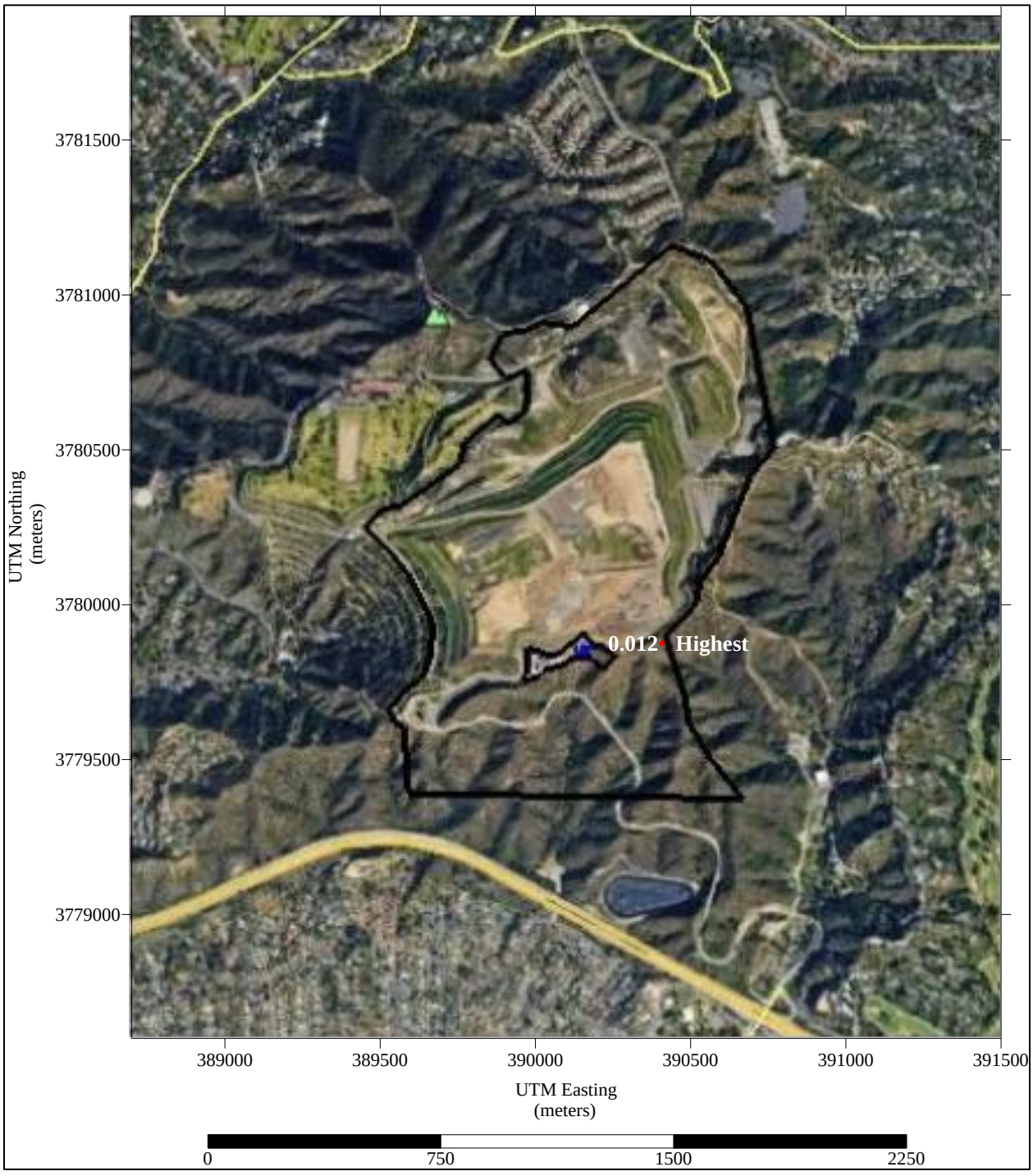
AERMOD Output for Annual Average PM10/PM2.5 Concentrations (µg/m³)



AERMOD Output for 1st highest 1-hour and 24-hour SO_2 Concentrations (ppm)



AERMOD Output for 4th highest 1-hour SO_2 Concentrations (ppm)



POST LANDFILL CLOSURE

MODELING INPUT INFORMATION

Point Sources - 1 Hour Model

Model ID	Source Description	UTME (m)	UTMN (m)	Elevation (m)	Stack Height (m)	Temperature (K)	Exit Velocity (m/s)	Stack Dia. (m)	NOx Emission (g/s)	CO Emission (g/s)	SO2 Emission (g/s)	PM Emission (g/s)
ENGINE1	Generator 1	390140.0	3779830.2	436.27	12.192	698.150	32.504	0.6096	3.94968	7.10960	0.10584	
ENGINE2	Generator 2	390147.2	3779828.8	437.82	12.192	698.150	32.504	0.6096	0.15372	1.10878	0.10584	
ENGINE3	Generator 3	390154.5	3779827.5	440.51	12.192	698.150	32.504	0.6096	0.15372	1.10878	0.10584	
ENGINE4	Generator 4	390161.7	3779827.4	443.05	12.192	698.150	32.504	0.6096	0.15372	1.10878	0.10584	
REGEN	Regen Flare	390047.3	3779809.2	429.86	8.534	1033.150	3.359	1.2192	0.01575	0.03780	0.01755	
FLARE12	Existing Flare 12	390039.6	3779808.2	429.97	4.877	1051.210	2.243	2.4384	0.11450	0.01027	0.04495	

Point Sources - 3 Hour Model

Model ID	Source Description	UTME (m)	UTMN (m)	Elevation (m)	Stack Height (m)	Temperature (K)	Exit Velocity (m/s)	Stack Dia. (m)	NOx Emission (g/s)	CO Emission (g/s)	SO2 Emission (g/s)	PM Emission (g/s)
ENGINE1	Generator 1	390140.0	3779830.2	439.40	12.192	698.150	32.504	0.6096			0.10584	
ENGINE2	Generator 2	390147.2	3779828.8	439.40	12.192	698.150	32.504	0.6096			0.10584	
ENGINE3	Generator 3	390154.5	3779827.5	439.40	12.192	698.150	32.504	0.6096			0.10584	
ENGINE4	Generator 4	390161.7	3779827.4	439.40	12.192	698.150	32.504	0.6096			0.10584	
REGEN	Regen Flare	390047.3	3779809.2	429.86	8.534	1033.150	3.359	1.2192			0.01755	
FLARE12	Existing Flare 12	390039.6	3779808.2	429.97	4.877	1051.210	2.243	2.4384			0.04495	

Point Sources - 8 Hour Model

Model ID	Source Description	UTME (m)	UTMN (m)	Elevation (m)	Stack Height (m)	Temperature (K)	Exit Velocity (m/s)	Stack Dia. (m)	NOx Emission (g/s)	CO Emission (g/s)	SO2 Emission (g/s)	PM Emission (g/s)
ENGINE1	Generator 1	390140.0	3779830.2	439.40	12.192	698.150	32.504	0.6096		3.37631		
ENGINE2	Generator 2	390147.2	3779828.8	439.40	12.192	698.150	32.504	0.6096		1.10878		
ENGINE3	Generator 3	390154.5	3779827.5	439.40	12.192	698.150	32.504	0.6096		1.10878		
ENGINE4	Generator 4	390161.7	3779827.4	439.40	12.192	698.150	32.504	0.6096		1.10878		
REGEN	Regen Flare	390047.3	3779809.2	429.86	8.534	1033.150	3.359	1.2192		0.03780		
FLARE12	Existing Flare 12	390039.6	3779808.2	429.97	4.877	1051.210	2.243	2.4384		0.01027		

Point Sources - 24 Hour Model

Model ID	Source Description	UTME (m)	UTMN (m)	Elevation (m)	Stack Height (m)	Temperature (K)	Exit Velocity (m/s)	Stack Dia. (m)	NOx Emission (g/s)	CO Emission (g/s)	SO2 Emission (g/s)	PM Emission (g/s)
ENGINE1	Generator 1	390140.0	3779830.2	439.40	12.192	698.150	32.504	0.6096			0.10584	0.07669
ENGINE2	Generator 2	390147.2	3779828.8	439.40	12.192	698.150	32.504	0.6096			0.10584	0.07669
ENGINE3	Generator 3	390154.5	3779827.5	439.40	12.192	698.150	32.504	0.6096			0.10584	0.07669
ENGINE4	Generator 4	390161.7	3779827.4	439.40	12.192	698.150	32.504	0.6096			0.10584	0.07669
REGEN	Regen Flare	390047.3	3779809.2	429.86	8.534	1033.150	3.359	1.2192			0.01755	0.01057
FLARE12	Existing Flare 12	390039.6	3779808.2	429.97	4.877	1051.210	2.243	2.4384			0.04495	0.05522

Point Sources - Annual Model

Model ID	Source Description	UTME (m)	UTMN (m)	Elevation (m)	Stack Height (m)	Temperature (K)	Exit Velocity (m/s)	Stack Dia. (m)	NOx Emission (g/s)	CO Emission (g/s)	SO2 Emission (g/s)	PM Emission (g/s)
ENGINE1	Generator 1	390140.0	3779830.2	439.40	12.192	698.150	32.504	0.6096	0.20660		0.10584	0.07669
ENGINE2	Generator 2	390147.2	3779828.8	439.40	12.192	698.150	32.504	0.6096	0.20660		0.10584	0.07669
ENGINE3	Generator 3	390154.5	3779827.5	439.40	12.192	698.150	32.504	0.6096	0.20660		0.10584	0.07669
ENGINE4	Generator 4	390161.7	3779827.4	439.40	12.192	698.150	32.504	0.6096	0.20660		0.10584	0.07669
REGEN	Regen Flare	390047.3	3779809.2	429.86	8.534	1033.150	3.359	1.2192	0.01575		0.01755	0.01057
FLARE12	Existing Flare 12	390039.6	3779808.2	429.97	4.877	1051.210	2.243	2.4384	0.11450		0.04495	0.05522

POST LANDFILL CLOSURE

AQIA RESULTS
(SHORT-TERM & ANNUAL)

Description	Pollutant	Averaging Period	Highest	Source Group	Conc (ug/m3)	UTME	UTMN	Conc Date mm/dd/yy/hh	Conc (ppm)	Background	Unit	Total	Unit	NAAQS	Unit	SCAQMD	Unit
CO State Standard/NAAQS																	
Scholl Canyon CO ICE 1hr Model	CO	1-HR	1ST	ALL	852.62	390227.3	3779790.7	11/23/16/17	0.77485	2.6	PPM	3.3748	PPM	35	PPM	20	PPM
				ENGINE1	534.49	390227.3	3779790.7	11/23/16/17	0.48573			3.0857	PPM				
				ENGINE2	80.89	390227.3	3779790.7	10/25/12/04	0.07351			2.6735	PPM				
				ENGINE3	113.58	390227.3	3779790.7	11/23/16/17	0.10322			2.7032	PPM				
				ENGINE4	138.68	390227.3	3779790.7	04/08/13/19	0.12603			2.7260	PPM				
				REGEN	5.74	390045.0	3779776.0	01/24/15/08	0.00521			2.6052	PPM				
				FLARE12	12.54	390041.0	3779818.0	01/31/16/14	0.01139			2.6114	PPM				
Scholl Canyon CO ICE 8hr Model	CO	8-HR	1ST	ALL	223.78	390227.3	3779790.7	10/25/12/16	0.20337	1.6	PPM	1.8034	PPM	9	PPM	9	PPM
				ENGINE1	97.03	390227.3	3779790.7	10/25/12/16	0.08818			1.6882	PPM				
				ENGINE2	34.52	390227.3	3779790.7	10/25/12/16	0.03137			1.6314	PPM				
				ENGINE3	39.92	390239.0	3779803.0	10/25/12/16	0.03628			1.6363	PPM				
				ENGINE4	53.99	390227.3	3779790.7	10/25/12/16	0.04907			1.6491	PPM				
				REGEN	3.11	390005.0	3779753.0	01/27/12/24	0.00282			1.6028	PPM				
				FLARE12	6.22	390041.0	3779818.0	05/25/12/16	0.00566			1.6057	PPM				
NO_2 State Standard - ARM2																	
Scholl Canyon NO2 ICE 1hr Model	NO2	1-HR	1ST	ALL	151.15	390227.3	3779790.7	5 YEARS	0.08361	0.0719	PPM	0.1555	PPM		PPM	0.18	PPM
				ENGINE1	133.19	390227.3	3779790.7	5 YEARS	0.07368			0.1456	PPM				
				ENGINE2	5.28	390227.3	3779790.7	5 YEARS	0.00292			0.0748	PPM				
				ENGINE3	6.38	390227.3	3779790.7	5 YEARS	0.00353			0.0754	PPM				
				ENGINE4	10.05	390227.3	3779790.7	5 YEARS	0.00556			0.0775	PPM				
				REGEN	1.67	390050.0	3779750.0	5 YEARS	0.00092			0.0728	PPM				
				FLARE12	99.80	390041.0	3779818.0	5 YEARS	0.05520			0.1271	PPM				
NO_2 NAAQS - ARM2																	
Scholl Canyon NO2 ICE 1hr Model	NO2	8TH-HIGHEST MAX DAILY 1-HR	1ST	ALL	116.56	390239.0	3779803.0	5 YEARS	0.06448	0.0593	PPM	0.1238	PPM	0.10	PPM		PPM
				ENGINE1	99.99	390239.0	3779803.0	5 YEARS	0.05531			0.1146	PPM				
				ENGINE2	4.35	390239.0	3779803.0	5 YEARS	0.00241			0.0617	PPM				
				ENGINE3	4.99	390239.0	3779803.0	5 YEARS	0.00276			0.0621	PPM				
				ENGINE4	6.76	390227.3	3779790.7	5 YEARS	0.00374			0.0630	PPM				
				REGEN	0.95	390050.0	3779750.0	5 YEARS	0.00052			0.0598	PPM				
				FLARE12	62.65	390041.0	3779818.0	5 YEARS	0.03465			0.0940	PPM				
PM10/PM2.5 State Standard																	
Scholl Canyon PM ICE 24hr Model	PM10/PM2.5	24-HR	1ST	ALL	11.73	390041.0	3779818.0	5/25/2012				11.731	UG/M3		UG/M3	Threshold PM10 - 2.5 PM2.5 - 2.5	UG/M3
				ENGINE1	1.53	390227.3	3779790.7	10/25/2012				1.528	UG/M3				
				ENGINE2	1.72	390227.3	3779790.7	10/25/2012				1.720	UG/M3				
				ENGINE3	1.90	390227.3	3779790.7	10/25/2012				1.901	UG/M3				
				ENGINE4	2.65	390227.3	3779790.7	10/25/2012				2.653	UG/M3				
				REGEN	0.49	390009.0	3779758.0	12/31/2014				0.485	UG/M3				
				FLARE12	11.70	390041.0	3779818.0	5/25/2012				11.703	UG/M3				
PM10 NAAQS Standard																	
Scholl Canyon PM ICE 24hr Model	PM10	24-HR	6TH	ALL	8.255	390041.0	3779818.0	7/1/2016		96	UG/M3	104.26	UG/M3	150	UG/M3		UG/M3
				ENGINE1	0.736	390227.3	3779790.7	3/8/2016				96.74	UG/M3				
				ENGINE2	0.867	390227.3	3779790.7	11/10/2012				96.87	UG/M3				
				ENGINE3	0.978	390227.3	3779790.7	11/23/2016				96.98	UG/M3				
				ENGINE4	1.319	390227.3	3779790.7	12/27/2012				97.32	UG/M3				
				REGEN	0.279	390100.0	3779750.0	12/14/2015				96.28	UG/M3				
				FLARE12	8.178	390041.0	3779818.0	7/1/2016				104.18	UG/M3				
PM2.5 NAAQS Standard																	
Scholl Canyon PM ICE 24hr Model	PM2.5	24-HR	8TH	ALL	8.027	390041.0	3779818.0	5/20/2016		30.5	UG/M3	38.53	UG/M3	35	UG/M3		UG/M3
				ENGINE1	0.715	390227.3	3779790.7	11/10/2012				31.21	UG/M3				
				ENGINE2	0.805	390227.3	3779790.7	6/9/2015				31.31	UG/M3				
				ENGINE3	0.890	390227.3	3779790.7	4/26/2014				31.39	UG/M3				
				ENGINE4	1.262	390227.3	3779790.7	3/8/2016				31.76	UG/M3				
				REGEN	0.238	390100.0	3779700.0	12/25/2015				30.74	UG/M3				
				FLARE12	7.944	390041.0	3779818.0	5/4/2013				38.44	UG/M3				

Description	Pollutant	Averaging Period	Highest	Source Group	Conc (ug/m3)	UTME	UTMN	Conc Date mm/dd/yy/hh	Conc (ppm)	Background	Unit	Total	Unit	NAAQS	Unit	SCAQMD	Unit
SO_2 State Standard																	
Scholl Canyon SO2 ICE 1hr Model	SO2	1-HR	1ST	ALL	45.11	390041.0	3779818.0	5 YEARS	0.01794	0.018	PPM	0.0359	PPM		PPM	0.25	PPM
				ENGINE1	7.04	390227.3	3779790.7	5 YEARS	0.00280			0.0208	PPM				
				ENGINE2	6.17	390239.0	3779803.0	5 YEARS	0.00245			0.0205	PPM				
				ENGINE3	7.64	390227.3	3779790.7	5 YEARS	0.00304			0.0210	PPM				
				ENGINE4	12.80	390227.3	3779790.7	5 YEARS	0.00509			0.0231	PPM				
				REGEN	2.06	390050.0	3779750.0	5 YEARS	0.00082			0.0188	PPM				
				FLARE12	45.08	390041.0	3779818.0	5 YEARS	0.01792								
Scholl Canyon SO2 ICE 3hr Model	SO2	3-HR	1ST	ALL	35.97	390041.0	3779818.0	05/25/12/12	0.01430	0.002	PPM	0.0163	PPM		PPM	0.04	PPM
				ENGINE1	4.63	390227.3	3779790.7	10/25/12/06	0.00184			0.0038	PPM				
				ENGINE2	5.06	390227.3	3779790.7	10/25/12/06	0.00201			0.0040	PPM				
				ENGINE3	6.08	390227.3	3779790.7	11/23/16/18	0.00242			0.0044	PPM				
				ENGINE4	7.61	390227.3	3779790.7	04/01/12/12	0.00302			0.0050	PPM				
				REGEN	2.00	390009.0	3779758.0	12/31/14/03	0.00079			0.0028	PPM				
				FLARE12	35.94	390041.0	3779818.0	05/25/12/12	0.01429			0.0163	PPM				
Scholl Canyon SO2 ICE 24hr Model	SO2	24-HR	1ST	ALL	11.09	390227.3	3779790.7	10/25/2012	0.00441	0.002	PPM	0.0064	PPM	0.5	PPM	0.04	PPM
				ENGINE1	2.11	390227.3	3779790.7	10/25/2012	0.00084			0.0028	PPM				
				ENGINE2	2.37	390227.3	3779790.7	10/25/2012	0.00094			0.0029	PPM				
				ENGINE3	2.62	390227.3	3779790.7	10/25/2012	0.00104			0.0030	PPM				
				ENGINE4	3.66	390227.3	3779790.7	10/25/2012	0.00146			0.0035	PPM				
				REGEN	0.80	390009.0	3779758.0	12/31/2014	0.00032			0.0023	PPM				
				FLARE12	9.53	390041.0	3779818.0	5/25/2012	0.00379			0.0058	PPM				
SO_2 NAAQS																	
Scholl Canyon SO2 ICE 1hr Model	SO2	4TH-HIGHEST MAX DAILY 1-HR	4TH	ALL	30.39	390041.0	3779818.0	5 YEARS	0.01208	0.0094	PPM	0.0215	PPM	0.075	PPM		PPM
				ENGINE1	4.18	390227.3	3779790.7	5 YEARS	0.00166			0.0111	PPM				
				ENGINE2	4.38	390239.0	3779803.0	5 YEARS	0.00174			0.0111	PPM				
				ENGINE3	5.21	390239.0	3779803.0	5 YEARS	0.00207			0.0115	PPM				
				ENGINE4	7.12	390227.3	3779790.7	5 YEARS	0.00283			0.0122	PPM				
				REGEN	1.68	390050.0	3779750.0	5 YEARS	0.00067			0.0101	PPM				
				FLARE12	30.34	390041.0	3779818.0	5 YEARS	0.01206			0.0215	PPM				

CO 1 Hour NAAQS = Not to be exceeded more than once per year. Design values based on highest 1 hour model result over 5 years and highest 1 hour monitored background 2017 - 2019.

CO 1 Hour SCAQMD = Not to be exceeded. Design values based on highest 1 hour model result over 5 years and highest 1 hour monitored background 2017 - 2019.

CO 8 Hour NAAQS = Not to be exceeded more than once per year. Design values based on highest 8 hour model result over 5 years and highest 8 hour monitored background 2017 - 2019.

CO 8 Hour SCAQMD = Not to be exceeded. Design values based on highest 8 hour model result over 5 years and highest 8 hour monitored background 2017 - 2019.

NO2 1 Hour NAAQS = 98th percentile of 1-hour daily maximum concentrations, averaged over 3 years (approx 8th highest). Design value based on 98th percentile of 1-hour daily maximum concentrations, averaged over 5 years and the highest 98th percentile monitored concentration for years 2017-2019.

NO2 1 Hour SCAQMD = Not to be exceeded. Design values based on highest 1 hour model result over 5 years and highest 1 hour monitored background 2017 - 2019.

PM10/PM2.5 24 Hour SCAQMD = Not to exceeded significant threshold. Design value based on 1st highest max 5 year model result.

PM10 24 Hour NAAQS = Not to be exceeded more than once per year on average over 3 years (2nd Highest). Design value based on 6th highest max 5 year model result and highest monitored background 2017-2019.

PM2.5 24 Hour NAAQS = 98th percentile, averaged over 3 years (8th highest not including secondary). Design value based on 98th percentile, averaged over 5 years, and the highest 98th percentile 24 hour monitored background 2017 - 2019. No secondary emissions included.

SO2 1 Hour NAAQS = 99th percentile of 1-hour daily maximum concentrations, averaged over 3 years (approx 4th highest). Design value based on 99th percentile of 1-hour daily maximum concentrations, averaged over 5 years and the highest 99th percentile 1 hour monitored background 2017 - 2019.

SO2 1 Hour SCAQMD = Not to be exceeded. Design values based on highest 1 hour model result over 5 years and highest 1 hour monitored background 2017 - 2019.

SO2 24 Hour SCAQMD = Not to be exceeded. Design values based on highest 24 hour model result over 5 years and highest 24 hour monitored background 2017 - 2019.

Description	Pollutant	Averaging Period	Highest	Source Group	Conc (ug/m3)	UTME	UTMN	Conc Date	Conc (ppm)	Background	Unit	Total	Unit	NAAQS	Unit	SCAQMD	Unit
NO_2 State Standard/NAAQS Normal Operations - ARM																	
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	ALL	2.915	390041.0	3779818.0	2012	0.00161	0.0154	PPM	0.0170	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	ALL	2.990	390041.0	3779818.0	2013	0.00165			0.0171	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	ALL	3.156	390041.0	3779818.0	2014	0.00175			0.0171	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	ALL	2.731	390041.0	3779818.0	2015	0.00151			0.0169	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	ALL	3.412	390041.0	3779818.0	2016	0.00189			0.0173	PPM				
								5 Year Max	**0.00189**			**0.0173**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	ENGINE1	0.352	390100.0	3780000.0	2012	0.000195	0.0154	PPM	0.0156	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	ENGINE1	0.352	390100.0	3780000.0	2013	0.000194			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	ENGINE1	0.358	390100.0	3780000.0	2014	0.000198			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	ENGINE1	0.332	390100.0	3780000.0	2015	0.000183			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	ENGINE1	0.360	390100.0	3780000.0	2016	0.000199			0.0156	PPM				
								5 Year Max	**0.000199**			**0.0156**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	ENGINE2	0.345	390100.0	3780000.0	2012	0.000191	0.0154	PPM	0.0156	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	ENGINE2	0.349	390150.0	3780000.0	2013	0.000193			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	ENGINE2	0.350	390100.0	3780000.0	2014	0.000193			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	ENGINE2	0.324	390100.0	3780000.0	2015	0.000179			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	ENGINE2	0.351	390100.0	3780000.0	2016	0.000194			0.0156	PPM				
								5 Year Max	**0.000194**			**0.0156**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	ENGINE3	0.346	390150.0	3779950.0	2012	0.000192	0.0154	PPM	0.0156	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	ENGINE3	0.358	390150.0	3779950.0	2013	0.000198			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	ENGINE3	0.353	390150.0	3780000.0	2014	0.000195			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	ENGINE3	0.338	390227.3	3779790.7	2015	0.000187			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	ENGINE3	0.355	390150.0	3780000.0	2016	0.000197			0.0156	PPM				
								5 Year Max	**0.000198**			**0.0156**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	ENGINE4	0.391	390227.3	3779790.7	2012	0.000217	0.0154	PPM	0.0156	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	ENGINE4	0.365	390150.0	3779950.0	2013	0.000202			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	ENGINE4	0.362	390150.0	3779950.0	2014	0.000200			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	ENGINE4	0.408	390227.3	3779790.7	2015	0.000226			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	ENGINE4	0.368	390227.3	3779790.7	2016	0.000203			0.0156	PPM				
								5 Year Max	**0.000226**			**0.0156**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	REGEN	0.092	390050.0	3779900.0	2012	0.0000507	0.0154	PPM	0.0155	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	REGEN	0.096	390050.0	3779900.0	2013	0.0000530			0.0155	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	REGEN	0.095	390050.0	3779900.0	2014	0.0000527			0.0155	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	REGEN	0.088	390050.0	3779900.0	2015	0.0000487			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	REGEN	0.096	390050.0	3779900.0	2016	0.0000529			0.0155	PPM				
								5 Year Max	**0.000053**			**0.0155**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	FLARE12	2.447	390041.0	3779818.0	2012	0.001354	0.0154	PPM	0.0168	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	FLARE12	2.539	390041.0	3779818.0	2013	0.001404			0.0168	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	FLARE12	2.691	390041.0	3779818.0	2014	0.001488			0.0169	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	FLARE12	2.291	390041.0	3779818.0	2015	0.001267			0.0167	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	FLARE12	3.005	390041.0	3779818.0	2016	0.001663			0.0171	PPM				
								5 Year Max	**0.001663**			**0.0171**	**PPM**				

Description	Pollutant	Averaging Period	Highest	Source Group	Conc (ug/m3)	UTME	UTMN	Conc Date	Conc (ppm)	Background	Unit	Total	Unit	NAAQS	Unit	SCAQMD	Unit
PM10/PM2.5 State Standard Normal																	
Scholl Canyon ICE AnnualElevation_2008_PM	PM10, PM2.5	ANNUAL	1ST	ALL	1.505	390041.0	3779818.0	2012				1.505	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE AnnualElevation_2009_PM	PM10, PM2.5	ANNUAL	1ST	ALL	1.547	390041.0	3779818.0	2013				1.547	UG/M3				
Scholl Canyon ICE AnnualElevation_2010_PM	PM10, PM2.5	ANNUAL	1ST	ALL	1.634	390041.0	3779818.0	2014				1.634	UG/M3				
Scholl Canyon ICE AnnualElevation_2011_PM	PM10, PM2.5	ANNUAL	1ST	ALL	1.410	390041.0	3779818.0	2015				1.410	UG/M3				
Scholl Canyon ICE AnnualElevation_2012_PM	PM10, PM2.5	ANNUAL	1ST	ALL	1.779	390041.0	3779818.0	2016				1.779	UG/M3				
				5 Year Average	**1.575**							**1.575**	**UG/M3**				
Scholl Canyon ICE Annual_2008_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE1	0.145	390100.0	3780000.0	2012				0.1454	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE Annual_2009_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE1	0.145	390100.0	3780000.0	2013				0.1450	UG/M3				
Scholl Canyon ICE Annual_2010_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE1	0.148	390100.0	3780000.0	2014				0.1476	UG/M3				
Scholl Canyon ICE Annual_2011_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE1	0.137	390100.0	3780000.0	2015				0.1368	UG/M3				
Scholl Canyon ICE Annual_2012_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE1	0.148	390100.0	3780000.0	2016				0.1484	UG/M3				
				5 Year Average	**0.145**							**0.1446**	**UG/M3**				
Scholl Canyon ICE Annual_2008_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE2	0.142	390100.0	3780000.0	2012				0.1425	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE Annual_2009_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE2	0.144	390150.0	3780000.0	2013				0.1440	UG/M3				
Scholl Canyon ICE Annual_2010_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE2	0.144	390100.0	3780000.0	2014				0.1443	UG/M3				
Scholl Canyon ICE Annual_2011_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE2	0.134	390100.0	3780000.0	2015				0.1337	UG/M3				
Scholl Canyon ICE Annual_2012_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE2	0.145	390100.0	3780000.0	2016				0.1448	UG/M3				
				5 Year Average	**0.142**							**0.1418**	**UG/M3**				
Scholl Canyon ICE AnnualElevation_2008_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE3	0.143	390150.0	3779950.0	2012				0.143	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE AnnualElevation_2009_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE3	0.148	390150.0	3779950.0	2013				0.148	UG/M3				
Scholl Canyon ICE AnnualElevation_2010_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE3	0.146	390150.0	3780000.0	2014				0.146	UG/M3				
Scholl Canyon ICE AnnualElevation_2011_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE3	0.139	390227.3	3779790.7	2015				0.139	UG/M3				
Scholl Canyon ICE AnnualElevation_2012_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE3	0.147	390150.0	3780000.0	2016				0.147	UG/M3				
				5 Year Average	**0.144**							**0.144**	**UG/M3**				
Scholl Canyon ICE AnnualElevation_2008_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE4	0.161	390227.3	3779790.7	2012				0.161	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE AnnualElevation_2009_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE4	0.150	390150.0	3779950.0	2013				0.150	UG/M3				
Scholl Canyon ICE AnnualElevation_2010_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE4	0.149	390150.0	3779950.0	2014				0.149	UG/M3				
Scholl Canyon ICE AnnualElevation_2011_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE4	0.168	390227.3	3779790.7	2015				0.168	UG/M3				
Scholl Canyon ICE AnnualElevation_2012_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE4	0.152	390227.3	3779790.7	2016				0.152	UG/M3				
				5 Year Average	**0.156**							**0.156**	**UG/M3**				
Scholl Canyon ICE AnnualElevation_2008_PM	PM10, PM2.5	ANNUAL	1ST	REGEN	0.068	390050.0	3779900.0	2012				0.068	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE AnnualElevation_2009_PM	PM10, PM2.5	ANNUAL	1ST	REGEN	0.071	390050.0	3779900.0	2013				0.071	UG/M3				
Scholl Canyon ICE AnnualElevation_2010_PM	PM10, PM2.5	ANNUAL	1ST	REGEN	0.071	390050.0	3779900.0	2014				0.071	UG/M3				
Scholl Canyon ICE AnnualElevation_2011_PM	PM10, PM2.5	ANNUAL	1ST	REGEN	0.066	390050.0	3779900.0	2015				0.066	UG/M3				
Scholl Canyon ICE AnnualElevation_2012_PM	PM10, PM2.5	ANNUAL	1ST	REGEN	0.071	390050.0	3779900.0	2016				0.071	UG/M3				
				5 Year Average	**0.070**							**0.070**	**UG/M3**				
Scholl Canyon ICE AnnualElevation_2008_PM	PM10, PM2.5	ANNUAL	1ST	FLARE12	1.311	390041.0	3779818.0	2012				1.311	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE AnnualElevation_2009_PM	PM10, PM2.5	ANNUAL	1ST	FLARE12	1.360	390041.0	3779818.0	2013				1.360	UG/M3				
Scholl Canyon ICE AnnualElevation_2010_PM	PM10, PM2.5	ANNUAL	1ST	FLARE12	1.442	390041.0	3779818.0	2014				1.442	UG/M3				
Scholl Canyon ICE AnnualElevation_2011_PM	PM10, PM2.5	ANNUAL	1ST	FLARE12	1.228	390041.0	3779818.0	2015				1.228	UG/M3				
Scholl Canyon ICE AnnualElevation_2012_PM	PM10, PM2.5	ANNUAL	1ST	FLARE12	1.611	390041.0	3779818.0	2016				1.611	UG/M3				
				5 Year Average	**1.390**							**1.390**	**UG/M3**				

NO2 Annual NAAQS = Annual mean. Design value based on highest annual mean over 5 years of model result and highest annual monitored background 2017 - 2019. ARM Method = 80% of model results.

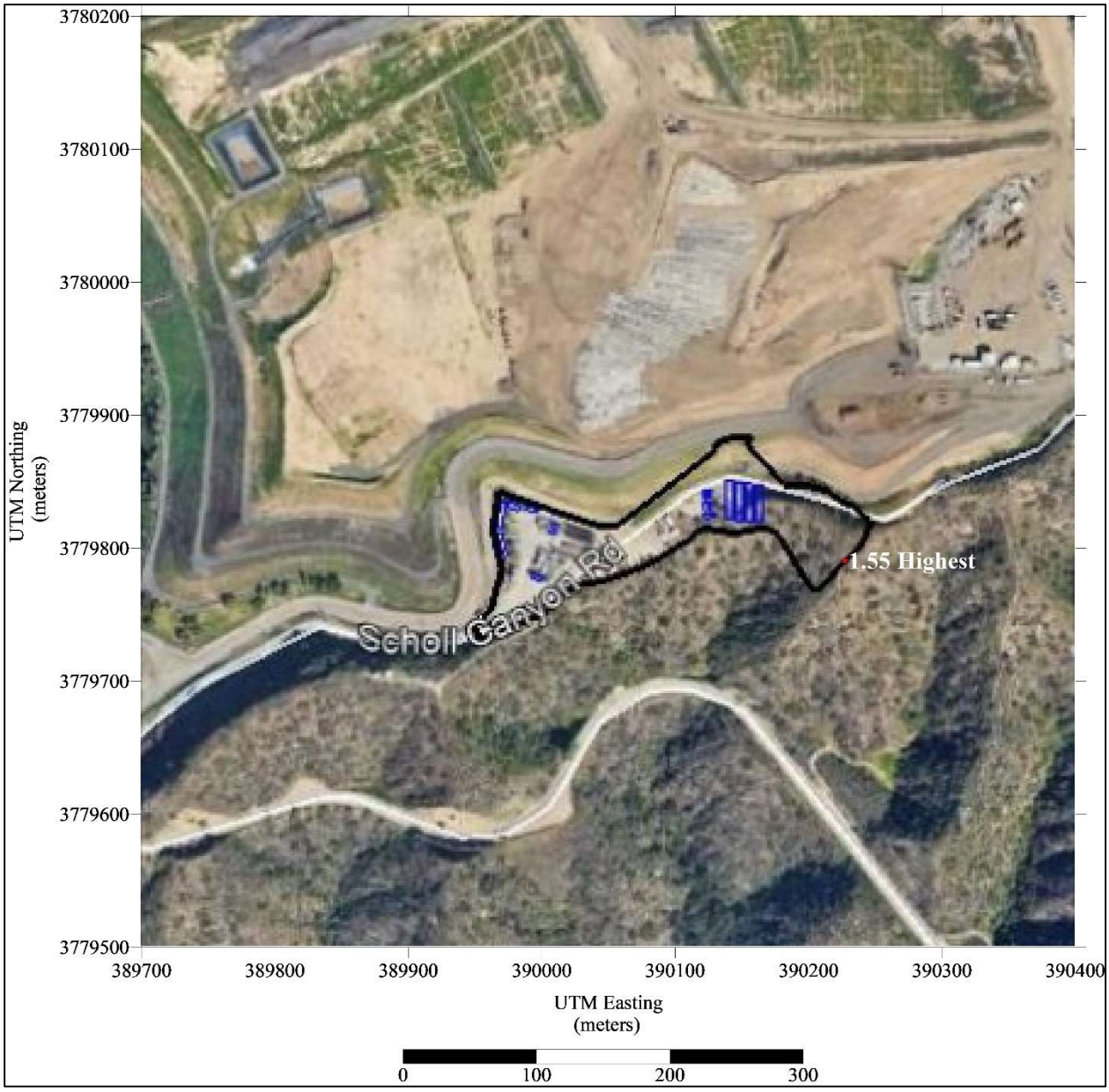
PM10/PM2.5 Annual SCAQMD = Not to exceeded significant threshold. Design value based on the 5 year average of annual mean model result.

PM Annual NAAQS = Equal to the annual mean averaged over 3 years. Design value based on the 5 year average of annual mean model result and highest annual monitored background 2017 - 2019.

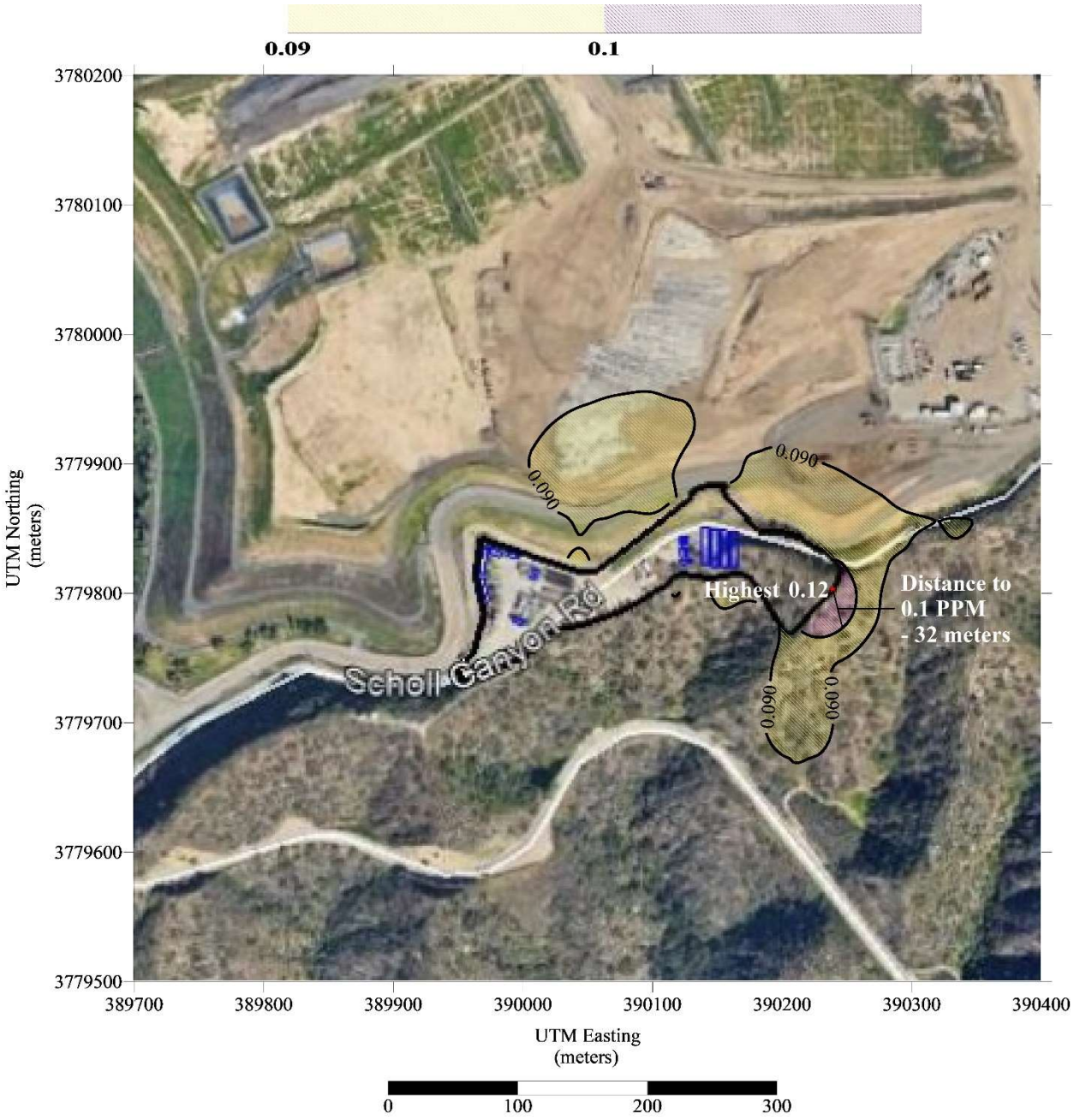
POST LANDFILL CLOSURE

SITE MAPS SHOWING THE LOCATIONS OF MODELING RESULTS

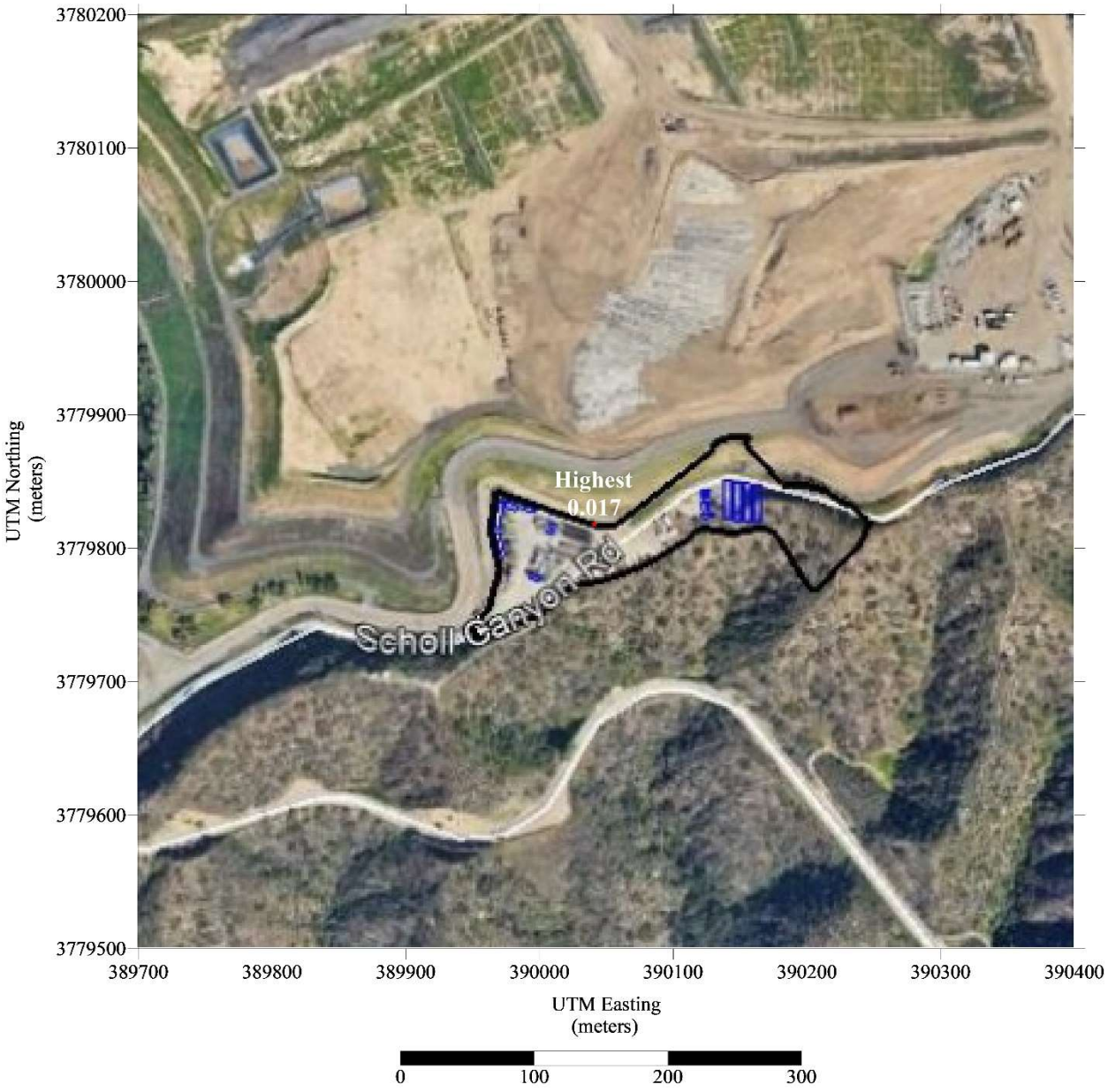
AERMOD Output for 1st highest 1-Hourly NO_2 Concentrations (in ppm)



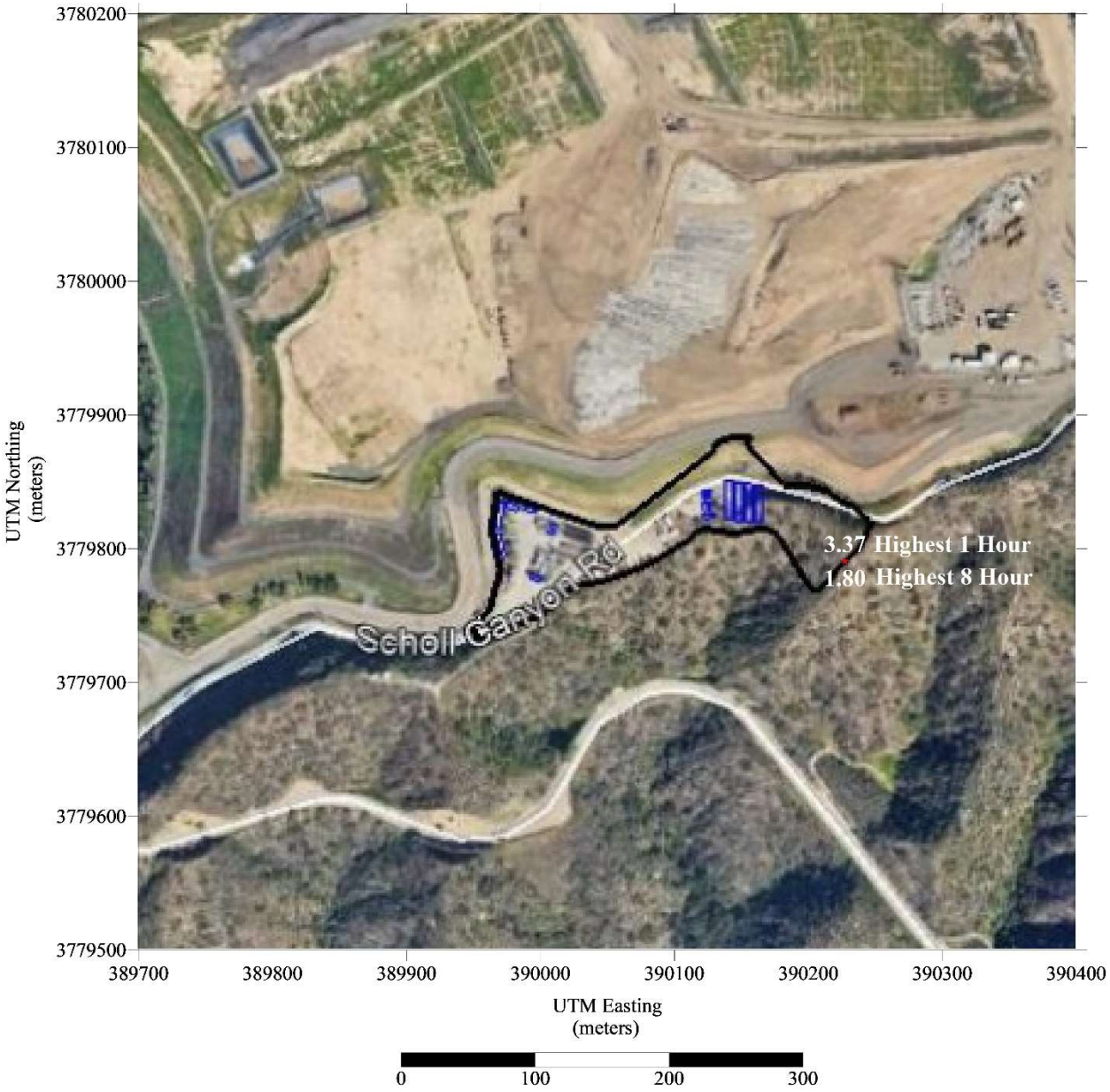
AERMOD Output for 8th highest 1-hourly NO2 Concentrations (ppm)



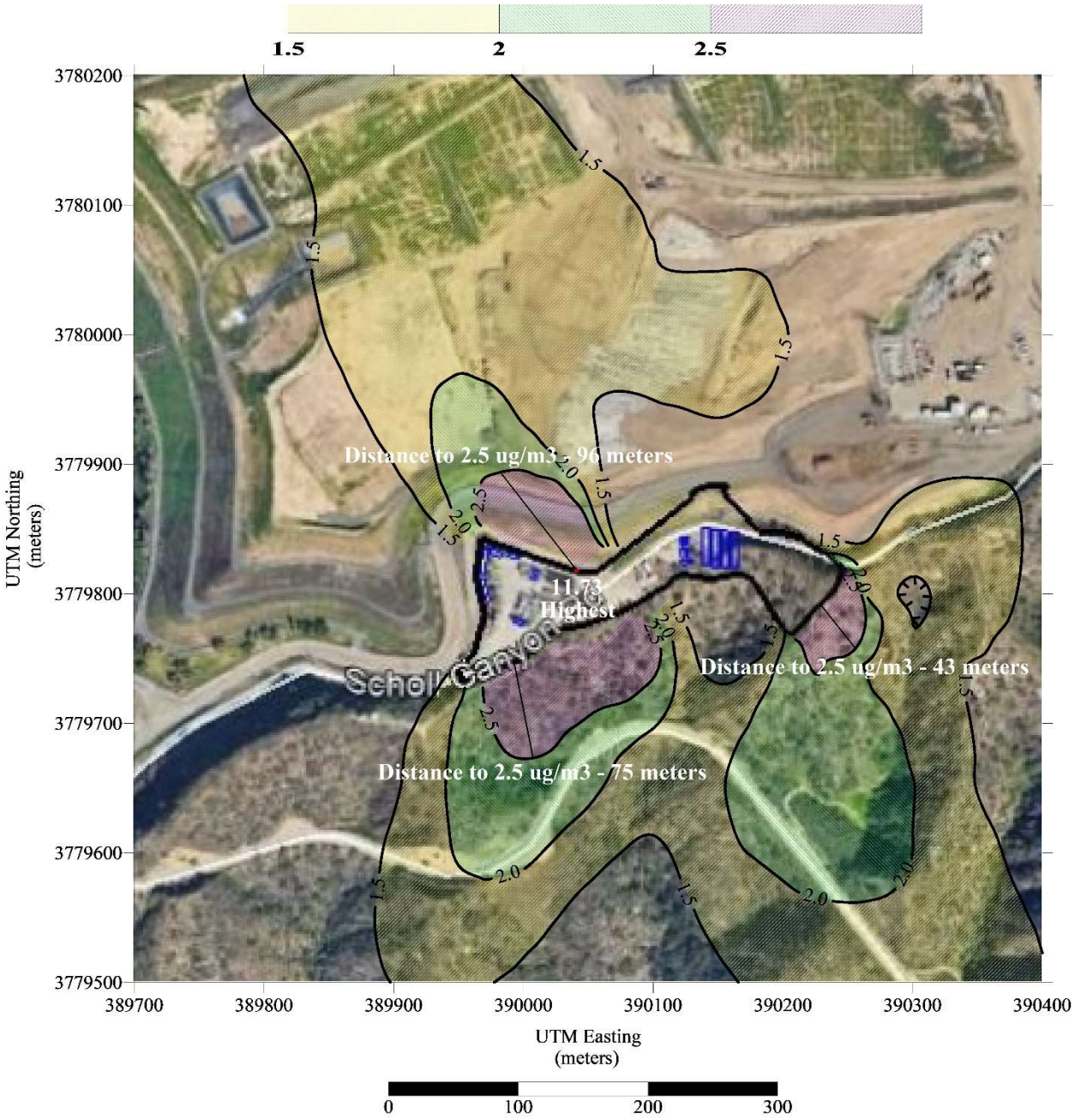
AERMOD Output for Annual NO_2 Concentrations (in ppm)



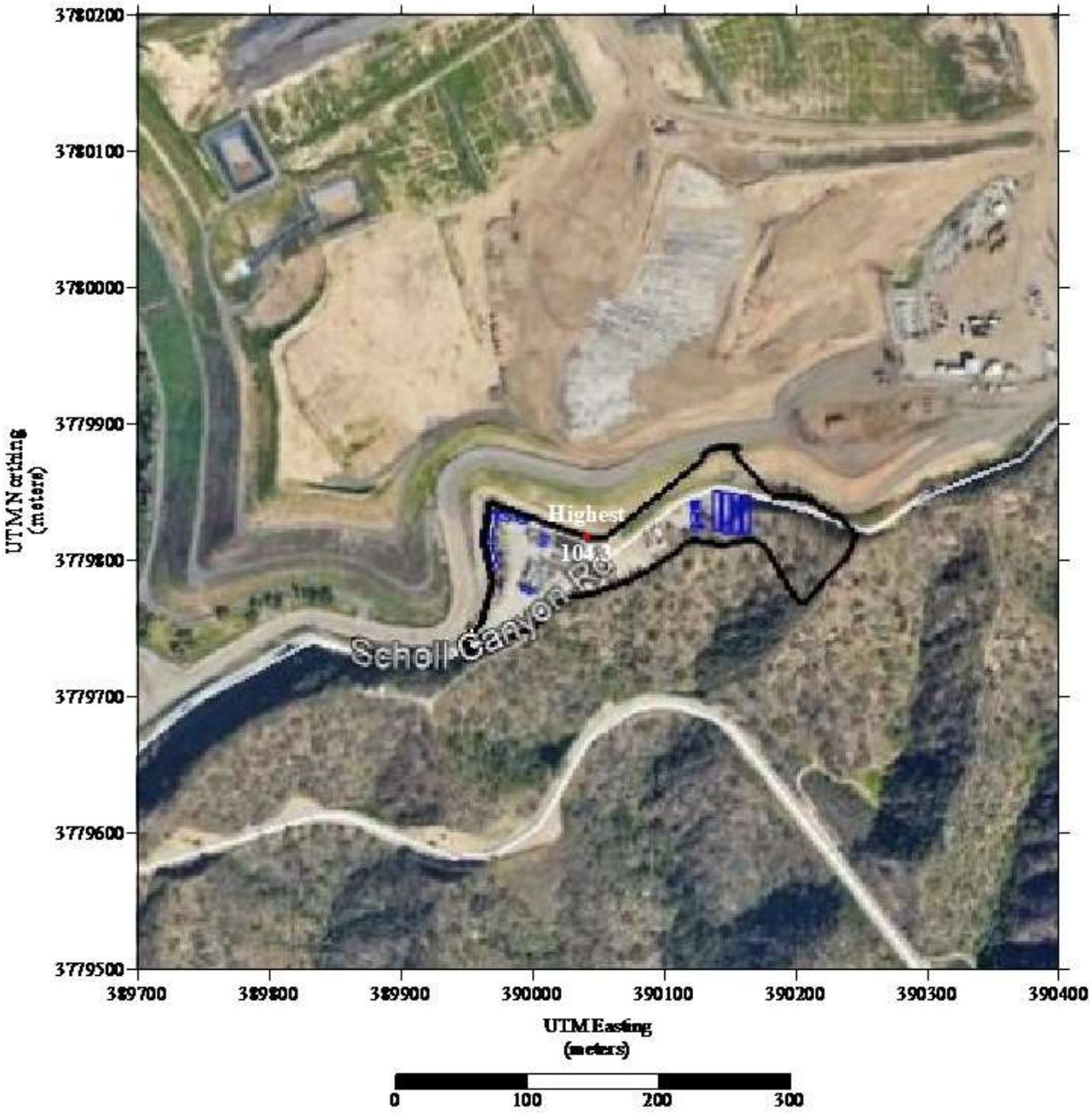
AERMOD Output for 1st Highest 1-Hourly and 8-Hourly CO Concentrations (in ppm)



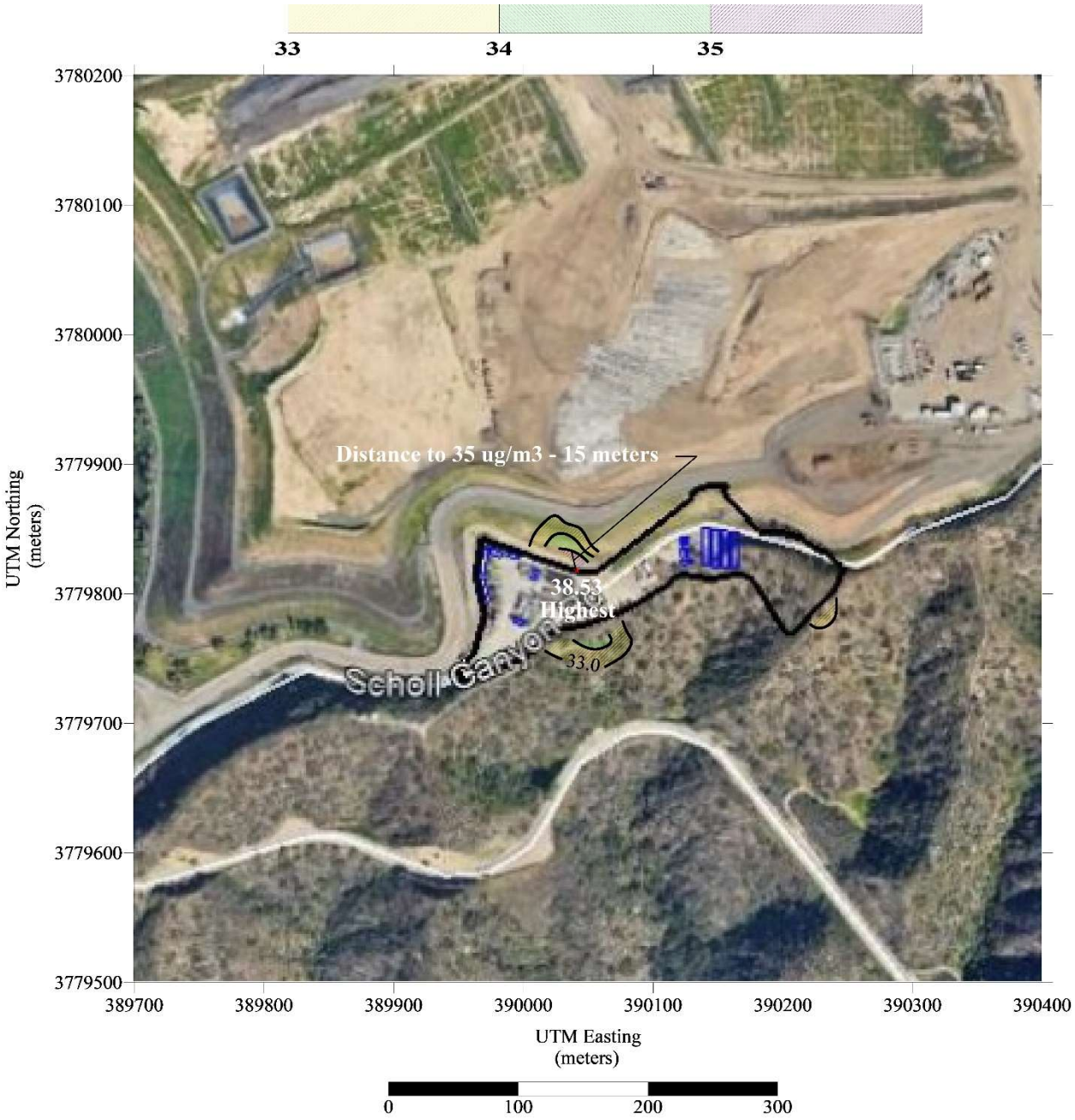
AERMOD Output for 1st Highest 24-hour PM10 Concentrations (µg/m³)



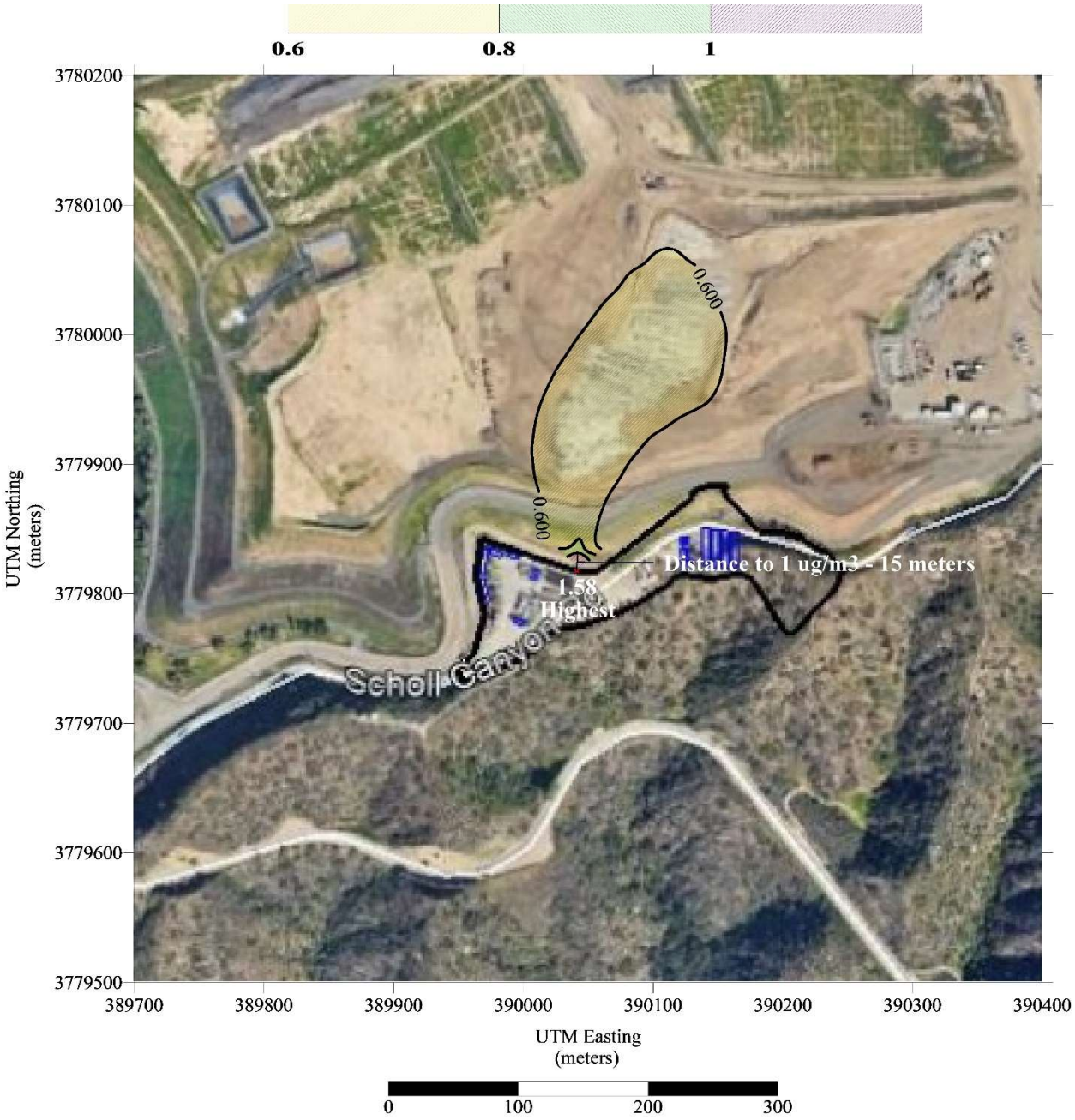
AERMOD Output for 6th Highest 24-hour PM10 Concentrations (µg/m³)



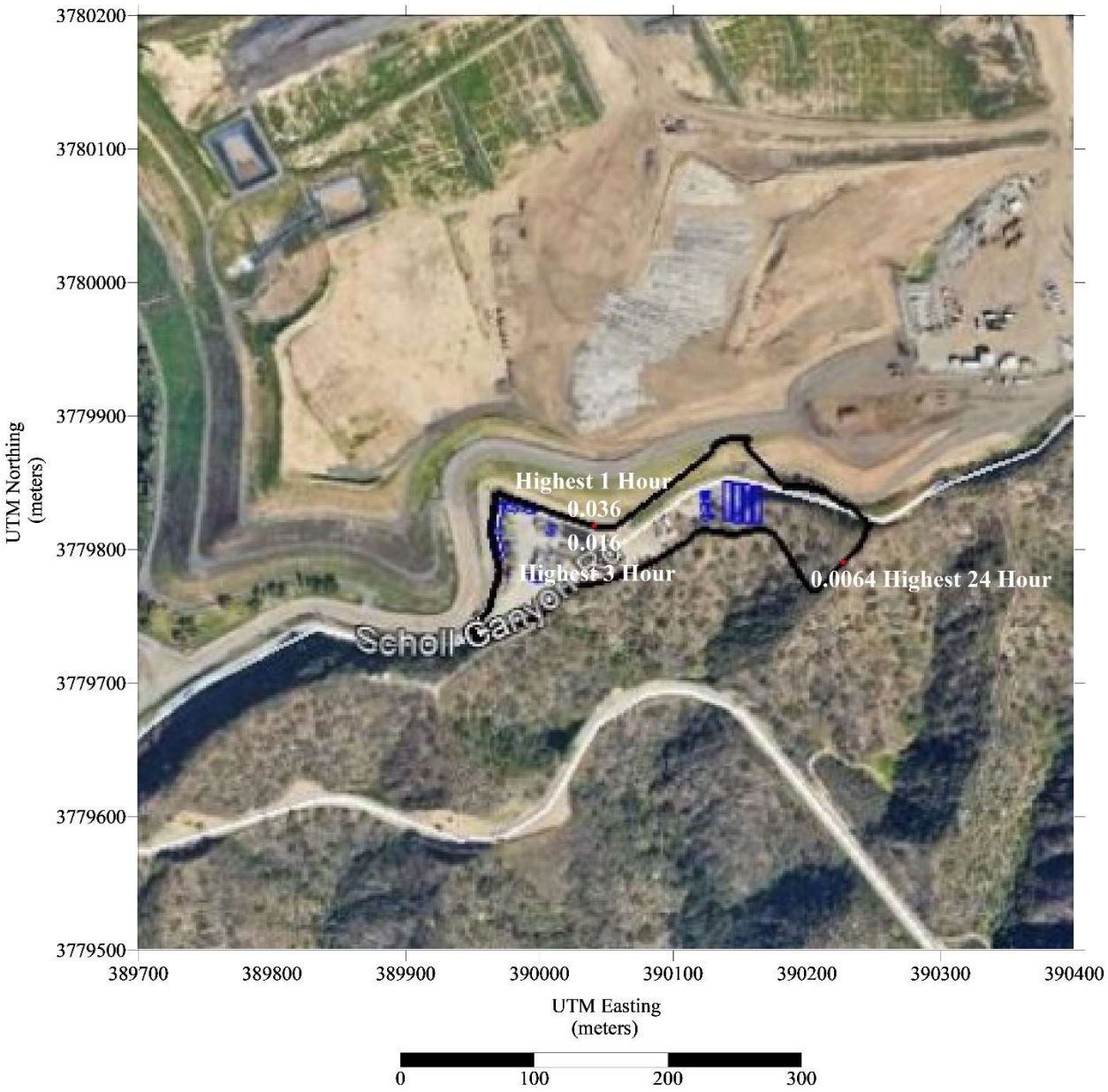
AERMOD Output for 8th Highest 24-hour PM2.5 Concentrations (µg/m³)



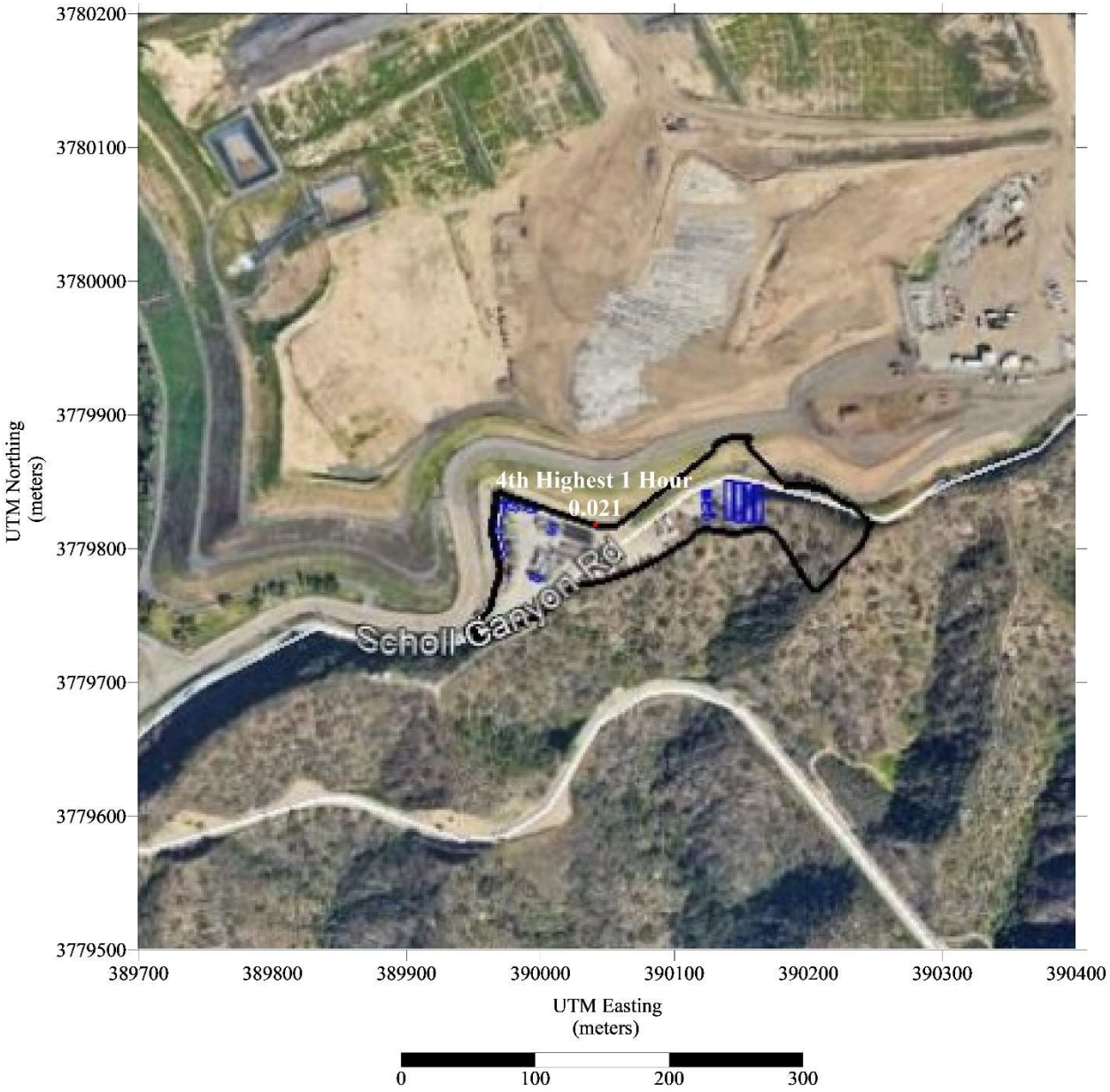
AERMOD Output for Annual Average PM10/PM2.5 Concentrations (µg/m³)



AERMOD Output for 1st highest 1-hour and 24-hour SO_2 Concentrations (ppm)



AERMOD Output for 4th highest 1-hour SO_2 Concentrations (ppm)



Errata Attachment C: Updated Project Health Risk Assessment Information

HRA RESULTS
(THE HIGHEST VALUES)

CANCER RISK

*HARP - HRACalc v21081 5/4/2021 11:06:29 AM - Cancer Risk - Input File: C:\Work\Bee\Glendale CA\Scholl Canyon 2021\HRA\Outer\SCHOLL CANYON LARGE BORDER 2021\hra\CancerHRAInput.hra

REC	GRP	NETID	X	Y	RISK_SUM	SCENARIO	INH_RISK	SOIL_RISK	DERMAL_RISK	MMILK_RISK	WATER_RISK	FISH_RISK	CROP_RISK	BEEF_RISK	DAIRY_RISK	PIG_RISK	CHICKEN_RISK	EGG_RISK
43	ALL		389940	3780593.5	2.64E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.64E-07	7.44E-13	4.21E-14	8.89E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
42	ALL		389918	3780577	2.61E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.61E-07	7.44E-13	4.21E-14	8.89E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
44	ALL		389962	3780610	2.60E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.60E-07	7.26E-13	4.11E-14	8.68E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3880	ALL		389950	3780650	2.51E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.51E-07	6.92E-13	3.92E-14	8.27E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3879	ALL		389900	3780650	2.45E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.45E-07	6.75E-13	3.82E-14	8.07E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3810	ALL		389900	3780600	2.45E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.45E-07	7.00E-13	3.97E-14	8.37E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
45	ALL		389979	3780651	2.37E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.37E-07	6.62E-13	3.75E-14	7.91E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
41	ALL		389884	3780608	2.34E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.34E-07	6.74E-13	3.81E-14	8.05E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3950	ALL		389950	3780700	2.31E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.31E-07	6.38E-13	3.61E-14	7.62E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3949	ALL		389900	3780700	2.29E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.29E-07	6.29E-13	3.56E-14	7.52E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3809	ALL		389850	3780600	2.28E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.28E-07	6.56E-13	3.72E-14	7.85E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
36	ALL		389759	3780447	2.24E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.24E-07	6.44E-13	3.64E-14	7.70E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
40	ALL		389848	3780578	2.23E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.23E-07	6.47E-13	3.66E-14	7.74E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
37	ALL		389767.5	3780482.5	2.22E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.22E-07	6.38E-13	3.61E-14	7.63E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3606	ALL		389750	3780450	2.21E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.21E-07	6.32E-13	3.58E-14	7.56E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
46	ALL		389980	3780686	2.19E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.19E-07	6.13E-13	3.47E-14	7.33E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3878	ALL		389850	3780650	2.18E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.18E-07	6.22E-13	3.52E-14	7.43E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
47	ALL		389977.5	3780719	2.17E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.17E-07	6.02E-13	3.41E-14	7.20E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
49	ALL		389941.5	3780738.5	2.11E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.11E-07	5.91E-13	3.35E-14	7.06E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
50	ALL		389908	3780725	2.11E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.11E-07	5.96E-13	3.37E-14	7.12E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3948	ALL		389850	3780700	2.10E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.10E-07	5.93E-13	3.36E-14	7.09E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
51	ALL		389884.5	3780758.5	2.10E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.10E-07	5.75E-13	3.26E-14	6.88E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3673	ALL		389750	3780500	2.09E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.09E-07	5.98E-13	3.39E-14	7.15E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3740	ALL		389800	3780550	2.08E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.08E-07	6.05E-13	3.43E-14	7.23E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
48	ALL		389975	3780752	2.07E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.07E-07	5.73E-13	3.25E-14	6.85E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
38	ALL		389776	3780518	2.03E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.03E-07	5.91E-13	3.35E-14	7.07E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
4017	ALL		389850	3780750	2.03E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.03E-07	5.63E-13	3.19E-14	6.73E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3808	ALL		389800	3780600	2.01E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.01E-07	5.83E-13	3.30E-14	6.97E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
35	ALL		389721	3780420.2	1.99E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.99E-07	5.77E-13	3.27E-14	6.90E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
39	ALL		389812	3780548	1.99E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.99E-07	5.83E-13	3.30E-14	6.97E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3739	ALL		389750	3780550	1.99E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.99E-07	5.70E-13	3.23E-14	6.82E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3605	ALL		389700	3780450	1.93E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.93E-07	5.53E-13	3.13E-14	6.61E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3672	ALL		389700	3780500	1.88E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.88E-07	5.36E-13	3.04E-14	6.41E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
4016	ALL		389800	3780750	1.85E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.85E-07	5.21E-13	2.95E-14	6.23E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3877	ALL		389800	3780650	1.81E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.81E-07	5.25E-13	2.97E-14	6.28E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
4082	ALL		389800	3780800	1.79E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.79E-07	4.87E-13	2.76E-14	5.82E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
53	ALL		389880.5	3780833	1.78E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.78E-07	4.79E-13	2.71E-14	5.73E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3807	ALL		389750	3780600	1.78E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.78E-07	5.16E-13	2.92E-14	6.17E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3947	ALL		389800	3780700	1.76E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.76E-07	5.09E-13	2.88E-14	6.09E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3538	ALL		389650	3780400	1.76E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.76E-07	5.08E-13	2.88E-14	6.08E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
20	ALL		389611.5	3780047.75	1.75E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.75E-07	5.34E-13	3.02E-14	6.39E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
21	ALL		389594	3780084	1.74E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.74E-07	5.29E-13	2.99E-14	6.32E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3738	ALL		389700	3780550	1.74E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.74E-07	4.99E-13	2.82E-14	5.96E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
4287	ALL		389950	3780950	1.72E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.72E-07	4.57E-13	2.59E-14	5.47E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
19	ALL		389629	3780011.5	1.72E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.72E-07	5.28E-13	2.99E-14	6.32E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
4288	ALL		390000	3780950	1.69E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.69E-07	4.42E-13	2.50E-14	5.29E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
52	ALL		389861	3780792	1.69E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.69E-07	4.59E-13	2.60E-14	5.49E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3604	ALL		389650	3780450	1.69E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.69E-07	4.86E-13	2.75E-14	5.81E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3090	ALL		389600	3780050	1.69E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.69E-07	5.16E-13	2.92E-14	6.17E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
22	ALL		389572.33	3780113.33	1.68E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.68E-07	5.09E-13	2.88E-14	6.09E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
4015	ALL		389750	3780750	1.67E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.67E-07	4.75E-13	2.69E-14	5.67E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
4081	ALL		389750	3780800	1.66E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.66E-07	4.50E-13	2.55E-14	5.38E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
18	ALL		389646.5	3779975.25	1.65E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.65E-07	5.09E-13	2.88E-14	6.08E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
57	ALL		389997	3780896	1.64E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.64E-07	4.26E-13	2.41E-14	5.10E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
23	ALL		389550.67	3780142.67	1.63E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.63E-07	4.89E-13	2.77E-14	5.85E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
4286	ALL		389900	3780950	1.62E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.62E-07	4.32E-13	2.44E-14	5.16E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
4218	ALL		390000	3780900	1.62E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.62E-07	4.22E-13	2.39E-14	5.05E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
34	ALL		389683	3780393.4	1.62E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.62E-07	4.66E-13	2.64E-14	5.57E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
33	ALL		389645	3780366.6	1.61E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.61E-07	4.65E-13	2.63E-14	5.56E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
4358	ALL		389950	3781000	1.60E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.60E-07	4.35E-13	2.46E-14	5.20E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
4357	ALL		389900	3781000	1.60E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.60E-07	4.38E-13	2.48E-14	5.24E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
56	ALL		389971	3780883	1.60E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.60E-07	4.22E-13	2.39E-14	5.05E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

CHRONIC

*HARP - HRACalc v21081 5/4/2021 11:36:36 AM - Chronic Risk - Input File: C:\Work\Bee\Glendale CA\Scholl Canyon 2021\HRA\Outer\SCHOLL CANYON LARGE BORDER 2021\hra\ChronicHRAInput.hra

REC	GRP	NETID	X	Y	SCENARIO	CV	CNS	IMMUN	KIDNEY	GILV	REPRO/DEVEL	RESP	SKIN	EYE	BONE/TEETH	ENDO	BLOOD	ODOR	GENERAL	MAXHI
44	ALL		389962	3780610	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.72E-04	0.00E+00	3.71E-04	6.77E-07	3.74E-04	1.64E-02	0.00E+00	1.46E-06	0.00E+00	7.22E-08	2.04E-05	0.00E+00	0.00E+00	1.64E-02
3880	ALL		389950	3780650	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.73E-04	0.00E+00	3.71E-04	6.35E-07	3.74E-04	1.63E-02	0.00E+00	1.37E-06	0.00E+00	7.03E-08	1.99E-05	0.00E+00	0.00E+00	1.63E-02
43	ALL		389940	3780593.5	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.70E-04	0.00E+00	3.69E-04	6.89E-07	3.72E-04	1.63E-02	0.00E+00	1.48E-06	0.00E+00	7.30E-08	2.06E-05	0.00E+00	0.00E+00	1.63E-02
3879	ALL		389900	3780650	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.61E-04	0.00E+00	3.60E-04	6.04E-07	3.63E-04	1.59E-02	0.00E+00	1.29E-06	0.00E+00	6.84E-08	1.93E-05	0.00E+00	0.00E+00	1.59E-02
42	ALL		389918	3780577	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.53E-04	0.00E+00	3.52E-04	6.89E-07	3.55E-04	1.56E-02	0.00E+00	1.48E-06	0.00E+00	7.16E-08	2.01E-05	0.00E+00	0.00E+00	1.56E-02
45	ALL		389979	3780651	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.41E-04	0.00E+00	3.40E-04	6.25E-07	3.43E-04	1.50E-02	0.00E+00	1.35E-06	0.00E+00	6.60E-08	1.86E-05	0.00E+00	0.00E+00	1.50E-02
3950	ALL		389950	3780700	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.40E-04	0.00E+00	3.39E-04	5.91E-07	3.41E-04	1.49E-02	0.00E+00	1.27E-06	0.00E+00	6.45E-08	1.82E-05	0.00E+00	0.00E+00	1.49E-02
3949	ALL		389900	3780700	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.39E-04	0.00E+00	3.38E-04	5.67E-07	3.41E-04	1.49E-02	0.00E+00	1.21E-06	0.00E+00	6.40E-08	1.81E-05	0.00E+00	0.00E+00	1.49E-02
3810	ALL		389900	3780600	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.29E-04	0.00E+00	3.27E-04	6.50E-07	3.30E-04	1.45E-02	0.00E+00	1.40E-06	0.00E+00	6.71E-08	1.89E-05	0.00E+00	0.00E+00	1.45E-02
47	ALL		389977.5	3780719	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.18E-04	0.00E+00	3.17E-04	5.68E-07	3.19E-04	1.40E-02	0.00E+00	1.23E-06	0.00E+00	6.06E-08	1.71E-05	0.00E+00	0.00E+00	1.40E-02
46	ALL		389980	3780686	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.13E-04	0.00E+00	3.12E-04	5.82E-07	3.15E-04	1.38E-02	0.00E+00	1.26E-06	0.00E+00	6.09E-08	1.72E-05	0.00E+00	0.00E+00	1.38E-02
41	ALL		389884	3780608	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.11E-04	0.00E+00	3.10E-04	6.26E-07	3.13E-04	1.38E-02	0.00E+00	1.35E-06	0.00E+00	6.41E-08	1.80E-05	0.00E+00	0.00E+00	1.38E-02
51	ALL		389884.5	3780758.5	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.13E-04	0.00E+00	3.12E-04	5.17E-07	3.15E-04	1.37E-02	0.00E+00	1.11E-06	0.00E+00	5.87E-08	1.66E-05	0.00E+00	0.00E+00	1.37E-02
3809	ALL		389850	3780600	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.03E-04	0.00E+00	3.02E-04	6.08E-07	3.05E-04	1.34E-02	0.00E+00	1.31E-06	0.00E+00	6.25E-08	1.76E-05	0.00E+00	0.00E+00	1.34E-02
48	ALL		389975	3780752	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.03E-04	0.00E+00	3.02E-04	5.42E-07	3.04E-04	1.33E-02	0.00E+00	1.17E-06	0.00E+00	5.77E-08	1.63E-05	0.00E+00	0.00E+00	1.33E-02
49	ALL		389941.5	3780738.5	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.02E-04	0.00E+00	3.01E-04	5.54E-07	3.04E-04	1.33E-02	0.00E+00	1.20E-06	0.00E+00	5.87E-08	1.66E-05	0.00E+00	0.00E+00	1.33E-02
37	ALL		389767.5	3780482.5	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.97E-04	0.00E+00	2.96E-04	5.96E-07	2.99E-04	1.31E-02	0.00E+00	1.29E-06	0.00E+00	6.09E-08	1.71E-05	0.00E+00	0.00E+00	1.31E-02
36	ALL		389759	3780447	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.96E-04	0.00E+00	2.95E-04	6.06E-07	2.98E-04	1.31E-02	0.00E+00	1.31E-06	0.00E+00	6.12E-08	1.72E-05	0.00E+00	0.00E+00	1.31E-02
3606	ALL		389750	3780450	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.95E-04	0.00E+00	2.94E-04	5.96E-07	2.97E-04	1.30E-02	0.00E+00	1.29E-06	0.00E+00	6.04E-08	1.70E-05	0.00E+00	0.00E+00	1.30E-02
3878	ALL		389850	3780650	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.95E-04	0.00E+00	2.94E-04	5.75E-07	2.97E-04	1.30E-02	0.00E+00	1.24E-06	0.00E+00	5.98E-08	1.68E-05	0.00E+00	0.00E+00	1.30E-02
50	ALL		389908	3780725	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.95E-04	0.00E+00	2.94E-04	5.55E-07	2.97E-04	1.30E-02	0.00E+00	1.20E-06	0.00E+00	5.84E-08	1.65E-05	0.00E+00	0.00E+00	1.30E-02
4017	ALL		389850	3780750	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.96E-04	0.00E+00	2.95E-04	5.08E-07	2.97E-04	1.30E-02	0.00E+00	1.09E-06	0.00E+00	5.66E-08	1.60E-05	0.00E+00	0.00E+00	1.30E-02
3948	ALL		389850	3780700	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.95E-04	0.00E+00	2.94E-04	5.44E-07	2.96E-04	1.30E-02	0.00E+00	1.17E-06	0.00E+00	5.82E-08	1.64E-05	0.00E+00	0.00E+00	1.30E-02
40	ALL		389848	3780578	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.88E-04	0.00E+00	2.87E-04	6.03E-07	2.89E-04	1.27E-02	0.00E+00	1.30E-06	0.00E+00	6.06E-08	1.70E-05	0.00E+00	0.00E+00	1.27E-02
3673	ALL		389750	3780500	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.79E-04	0.00E+00	2.78E-04	5.62E-07	2.80E-04	1.23E-02	0.00E+00	1.21E-06	0.00E+00	5.71E-08	1.61E-05	0.00E+00	0.00E+00	1.23E-02
53	ALL		389880.5	3780833	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.80E-04	0.00E+00	2.79E-04	4.09E-07	2.81E-04	1.22E-02	0.00E+00	8.68E-07	0.00E+00	5.05E-08	1.43E-05	0.00E+00	0.00E+00	1.22E-02
4288	ALL		390000	3780950	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.79E-04	0.00E+00	2.78E-04	4.05E-07	2.80E-04	1.22E-02	0.00E+00	8.74E-07	0.00E+00	4.84E-08	1.37E-05	0.00E+00	0.00E+00	1.22E-02
4219	ALL		390100	3780900	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.79E-04	0.00E+00	2.78E-04	3.56E-07	2.80E-04	1.21E-02	0.00E+00	7.74E-07	0.00E+00	4.50E-08	1.29E-05	0.00E+00	0.00E+00	1.21E-02
61	ALL		390125	3780894	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.78E-04	0.00E+00	2.77E-04	3.56E-07	2.79E-04	1.21E-02	0.00E+00	7.80E-07	0.00E+00	4.44E-08	1.27E-05	0.00E+00	0.00E+00	1.21E-02
60	ALL		390091	3780899	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.76E-04	0.00E+00	2.75E-04	3.52E-07	2.77E-04	1.20E-02	0.00E+00	7.64E-07	0.00E+00	4.48E-08	1.28E-05	0.00E+00	0.00E+00	1.20E-02
4287	ALL		389950	3780950	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.74E-04	0.00E+00	2.73E-04	4.14E-07	2.76E-04	1.20E-02	0.00E+00	8.92E-07	0.00E+00	4.88E-08	1.39E-05	0.00E+00	0.00E+00	1.20E-02
4082	ALL		389800	3780800	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.72E-04	0.00E+00	2.71E-04	4.25E-07	2.73E-04	1.19E-02	0.00E+00	9.05E-07	0.00E+00	5.03E-08	1.42E-05	0.00E+00	0.00E+00	1.19E-02
57	ALL		389997	3780896	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.72E-04	0.00E+00	2.72E-04	3.73E-07	2.74E-04	1.19E-02	0.00E+00	7.97E-07	0.00E+00	4.69E-08	1.33E-05	0.00E+00	0.00E+00	1.19E-02
3739	ALL		389750	3780550	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.68E-04	0.00E+00	2.67E-04	5.34E-07	2.70E-04	1.18E-02	0.00E+00	1.15E-06	0.00E+00	5.47E-08	1.54E-05	0.00E+00	0.00E+00	1.18E-02
3740	ALL		389800	3780550	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.67E-04	0.00E+00	2.66E-04	5.67E-07	2.69E-04	1.18E-02	0.00E+00	1.22E-06	0.00E+00	5.65E-08	1.59E-05	0.00E+00	0.00E+00	1.18E-02
4218	ALL		390000	3780900	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.70E-04	0.00E+00	2.69E-04	3.69E-07	2.71E-04	1.18E-02	0.00E+00	7.89E-07	0.00E+00	4.65E-08	1.32E-05	0.00E+00	0.00E+00	1.18E-02
4289	ALL		390050	3780950	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.70E-04	0.00E+00	2.69E-04	3.59E-07	2.71E-04	1.17E-02	0.00E+00	7.76E-07	0.00E+00	4.50E-08	1.28E-05	0.00E+00	0.00E+00	1.17E-02
3808	ALL		389800	3780600	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.63E-04	0.00E+00	2.62E-04	5.45E-07	2.64E-04	1.16E-02	0.00E+00	1.17E-06	0.00E+00	5.49E-08	1.54E-05	0.00E+00	0.00E+00	1.16E-02
38	ALL		389776	3780518	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.61E-04	0.00E+00	2.60E-04	5.56E-07	2.62E-04	1.15E-02	0.00E+00	1.20E-06	0.00E+00	5.52E-08	1.55E-05	0.00E+00	0.00E+00	1.15E-02
58	ALL		390023	3780909	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.64E-04	0.00E+00	2.63E-04	3.55E-07	2.65E-04	1.15E-02	0.00E+00	7.60E-07	0.00E+00	4.49E-08	1.28E-05	0.00E+00	0.00E+00	1.15E-02
35	ALL		389721	3780420.2	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.60E-04	0.00E+00	2.59E-04	5.52E-07	2.61E-04	1.15E-02	0.00E+00	1.20E-06	0.00E+00	5.43E-08	1.53E-05	0.00E+00	0.00E+00	1.15E-02
4290	ALL		390100	3780950	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.62E-04	0.00E+00	2.62E-04	3.38E-07	2.63E-04	1.14E-02	0.00E+00	7.35E-07	0.00E+00	4.26E-08	1.22E-05	0.00E+00	0.00E+00	1.14E-02
3605	ALL		389700	3780450	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.57E-04	0.00E+00	2.56E-04	5.30E-07	2.59E-04	1.14E-02	0.00E+00	1.15E-06	0.00E+00	5.28E-08	1.48E-05	0.00E+00	0.00E+00	1.14E-02
4016	ALL		389800	3780750	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.57E-04	0.00E+00	2.56E-04	4.80E-07	2.59E-04	1.13E-02	0.00E+00	1.03E-06	0.00E+00	5.10E-08	1.44E-05	0.00E+00	0.00E+00	1.13E-02
52	ALL		389861	3780792	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.58E-04	0.00E+00	2.58E-04	3.84E-07	2.60E-04	1.13E-02	0.00E+00	8.09E-07	0.00E+00	4.76E-08	1.35E-05	0.00E+00	0.00E+00	1.13E-02
56	ALL		389971	3780883	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.58E-04	0.00E+00	2.57E-04	3.63E-07	2.59E-04	1.13E-02	0.00E+00	7.71E-07	0.00E+00	4.55E-08	1.29E-05	0.00E+00	0.00E+00	1.13E-02
4286	ALL		389900	3780950	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.58E-04	0.00E+00	2.57E-04	3.75E-07	2.59E-04	1.13E-02	0.00E+00	7.99E-07	0.00E+00	4.60E-08	1.31E-05	0.00E+00	0.00E+00	1.13E-02
3672	ALL		389700	3780500	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.55E-04	0.00E+00	2.54E-04	5.11E-07	2.57E-04	1.13E-02	0.00E+00	1.11E-06	0.00E+00	5.17E-08	1.45E-05	0.00E+00	0.00E+00	1.13E-02
39	ALL		389812	3780548	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.53E-04	0.00E+00	2.52E-04	5.44E-07	2.54E-04	1.12E-02	0.00E+00	1.17E-06	0.00E+00	5.41E-08	1.52E-05	0.00E+00	0.00E+00	1.12E-02
4081	ALL		389750	3780800	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.52E-04	0.00E+00	2.52E-04	3.93E-07	2.54E-04	1.11E-02	0.00E+00	8.36E-07	0.00E+00	4.66E-08	1.32E-05	0.00E+00	0.00E+00	1.11E-02
4217	ALL		389950	3780900	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.53E-04	0.00E+00	2.52E-04	3.59E-07	2.54E-04	1.11E-02	0.00E+00	7.62E-07	0.00E+00	4.49E-08	1.27E-05	0.00E+00	0.00E+00	1.11E-02
59	ALL		390057	3780904	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.53E-04	0.00E+00	2.52E-04	3.34E-07	2.54E-04	1.10E-02	0.00E+00	7.17E-07	0.00E+00	4.25E-08	1.21E-05	0.00E+00	0.00E+00	1.10E-02
62	ALL		390160	3780923	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.54E-04	0.00E+00	2.53E-04	3.16E-07	2.55E-04	1.10E-02	0.00E+00	6.94E-07	0.00E+00	3.98E-08	1.14E-05	0.00E+00	0.00E+00	1.10E-02
55	ALL		389935.5	3780878.5	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.48E-04	0.00E+00	2.47E-04	3.57E-07	2.49E-04	1.08E-02	0.00E+00	7.57E-07	0.00E+00	4.46E-08	1.26E-05	0.00E+00	0.00E+00	1.08E-02
4291	ALL		390150	3780950	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.50E-04	0.00E+00	2.49E-04	3.15E-07	2.51E-04	1.08E-02	0.00E+00	6.92E-07	0.00E+00	3.96E-08	1.13E-05	0.00E+00	0.00E+00	1.08E-02
4361	ALL		390100	3781000	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.46E-04	0.00E+00	2.46E-04	3.52E-07	2.47E-04	1.07E-02	0.00E+00	7.69E-07	0.00E+00	4.13E-08	1.18E-05	0.00E+00	0.00E+00	1.07E-02
4360	ALL		390050	3781000	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.45E-04	0.00E+00	2.45E-04	3.82E-07	2.46E-04	1.07E-02	0.00E+00	8.32E-07	0.00E+00	4.31E-08	1.22E-05	0.00E+00	0.00E+00	1.07E-02
4358	ALL		389950	3781000	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.43E-04	0.00E+00	2.42E-04	4.08E-07	2.44E-04	1.06E-02	0.00E+00	8.83E-07	0.00E+00	4.49E-08	1.27E-05	0.00E+00	0.00E+00	1.06E-02
4357	ALL		389900	3781000	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.39E-04	0.00E+00	2.38E-04	4.06E-07	2.40E-04	1.05E-02	0.00E+00	8.76E-07	0.00E+00	4.48E-08	1.27E-05	0.00E+00	0.00E+00	1.05E-02
4359	ALL		390000	3781000	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.38E-04	0.00E+00	2.38E-04	3.98E-07	2.40E-04	1.04E-02	0.00E+00	8.66E-07	0.00E+00	4.36E-08	1.24E-05	0.00E+00	0.00E+00	1.04E-02
3877	ALL		389800	3780650	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.34E-04	0.00E+00	2.33E-04	4.93E-07	2.36E-04	1.04E-02	0.00E+00	1.06E-06	0.00E+00	4.92E-08	1.38E-05	0.00E+00	0.00E+00	1.04E-02
4356	ALL		389850	3781000	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.36E-04	0.00E+00	2.35E-04	3.49E-07	2.37E-04	1.03E-02	0.00E+00	7.43E-07	0.00E+00	4.25E-08	1.20E-05	0.00E+00	0.00E+00	1.03E-02
3807	ALL		389750	3780600	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.33E-04	0.00E+00	2.32E-04	4.88E-07	2.34E-04	1.03E-02	0.00E+00	1.05E-06	0.00E+00	4.87E-08	1.37E-05	0.00E+00	0.00E+00	1.03E-02

CHRONIC 8-HOUR

*HARP - HRACalc v21081 5/4/2021 2:05:59 PM - Chronic 8Hr Risk - Input File: C:\Work\Bee\Glendale CA\Scholl Canyon 2021\HRA\Outer\SCHOLL CANYON LARGE BORDER 2021\hra\Chronic8HRAInput.hra

REC	GRP	NETID	X	Y	SCENARIO	CV	CNS	IMMUN	KIDNEY	GILV	REPRO/DEVEL	RESP	SKIN	EYE	BONE/TEETH	ENDO	BLOOD	ODOR	GENERAL	MAXHI
43	ALL		389940	3780594	NonCancer8HrChronic	0.00E+00	6.64E-05	0.00E+00	6.51E-05	0.00E+00	6.51E-05	8.12E-04	0.00E+00	4.61E-07	0.00E+00	0.00E+00	2.06E-05	0.00E+00	0.00E+00	8.12E-04
42	ALL		389918	3780577	NonCancer8HrChronic	0.00E+00	6.34E-05	0.00E+00	6.21E-05	0.00E+00	6.21E-05	8.08E-04	0.00E+00	4.61E-07	0.00E+00	0.00E+00	2.01E-05	0.00E+00	0.00E+00	8.08E-04
44	ALL		389962	3780610	NonCancer8HrChronic	0.00E+00	6.67E-05	0.00E+00	6.54E-05	0.00E+00	6.54E-05	7.95E-04	0.00E+00	4.54E-07	0.00E+00	0.00E+00	2.04E-05	0.00E+00	0.00E+00	7.95E-04
3880	ALL		389950	3780650	NonCancer8HrChronic	0.00E+00	6.68E-05	0.00E+00	6.55E-05	0.00E+00	6.55E-05	7.61E-04	0.00E+00	4.25E-07	0.00E+00	0.00E+00	1.99E-05	0.00E+00	0.00E+00	7.61E-04
3810	ALL		389900	3780600	NonCancer8HrChronic	0.00E+00	5.90E-05	0.00E+00	5.77E-05	0.00E+00	5.77E-05	7.60E-04	0.00E+00	4.35E-07	0.00E+00	0.00E+00	1.89E-05	0.00E+00	0.00E+00	7.60E-04
3879	ALL		389900	3780650	NonCancer8HrChronic	0.00E+00	6.48E-05	0.00E+00	6.35E-05	0.00E+00	6.35E-05	7.42E-04	0.00E+00	4.02E-07	0.00E+00	0.00E+00	1.93E-05	0.00E+00	0.00E+00	7.42E-04
41	ALL		389884	3780608	NonCancer8HrChronic	0.00E+00	5.59E-05	0.00E+00	5.47E-05	0.00E+00	5.47E-05	7.30E-04	0.00E+00	4.19E-07	0.00E+00	0.00E+00	1.80E-05	0.00E+00	0.00E+00	7.30E-04
45	ALL		389979	3780651	NonCancer8HrChronic	0.00E+00	6.12E-05	0.00E+00	5.99E-05	0.00E+00	5.99E-05	7.25E-04	0.00E+00	4.20E-07	0.00E+00	0.00E+00	1.86E-05	0.00E+00	0.00E+00	7.25E-04
3809	ALL		389850	3780600	NonCancer8HrChronic	0.00E+00	5.44E-05	0.00E+00	5.33E-05	0.00E+00	5.33E-05	7.11E-04	0.00E+00	4.06E-07	0.00E+00	0.00E+00	1.76E-05	0.00E+00	0.00E+00	7.11E-04
3950	ALL		389950	3780700	NonCancer8HrChronic	0.00E+00	6.09E-05	0.00E+00	5.97E-05	0.00E+00	5.97E-05	7.01E-04	0.00E+00	3.96E-07	0.00E+00	0.00E+00	1.82E-05	0.00E+00	0.00E+00	7.01E-04
40	ALL		389848	3780578	NonCancer8HrChronic	0.00E+00	5.16E-05	0.00E+00	5.05E-05	0.00E+00	5.05E-05	6.98E-04	0.00E+00	4.03E-07	0.00E+00	0.00E+00	1.70E-05	0.00E+00	0.00E+00	6.98E-04
36	ALL		389759	3780447	NonCancer8HrChronic	0.00E+00	5.32E-05	0.00E+00	5.20E-05	0.00E+00	5.20E-05	6.97E-04	0.00E+00	4.07E-07	0.00E+00	0.00E+00	1.72E-05	0.00E+00	0.00E+00	6.97E-04
3949	ALL		389900	3780700	NonCancer8HrChronic	0.00E+00	6.08E-05	0.00E+00	5.96E-05	0.00E+00	5.96E-05	6.93E-04	0.00E+00	3.77E-07	0.00E+00	0.00E+00	1.81E-05	0.00E+00	0.00E+00	6.93E-04
37	ALL		389767.5	3780483	NonCancer8HrChronic	0.00E+00	5.33E-05	0.00E+00	5.21E-05	0.00E+00	5.21E-05	6.91E-04	0.00E+00	3.99E-07	0.00E+00	0.00E+00	1.71E-05	0.00E+00	0.00E+00	6.91E-04
3606	ALL		389750	3780450	NonCancer8HrChronic	0.00E+00	5.30E-05	0.00E+00	5.18E-05	0.00E+00	5.18E-05	6.86E-04	0.00E+00	4.00E-07	0.00E+00	0.00E+00	1.70E-05	0.00E+00	0.00E+00	6.86E-04
3878	ALL		389850	3780650	NonCancer8HrChronic	0.00E+00	5.30E-05	0.00E+00	5.19E-05	0.00E+00	5.19E-05	6.75E-04	0.00E+00	3.84E-07	0.00E+00	0.00E+00	1.68E-05	0.00E+00	0.00E+00	6.75E-04
46	ALL		389980	3780686	NonCancer8HrChronic	0.00E+00	5.62E-05	0.00E+00	5.50E-05	0.00E+00	5.50E-05	6.71E-04	0.00E+00	3.92E-07	0.00E+00	0.00E+00	1.72E-05	0.00E+00	0.00E+00	6.71E-04
47	ALL		389977.5	3780719	NonCancer8HrChronic	0.00E+00	5.70E-05	0.00E+00	5.58E-05	0.00E+00	5.58E-05	6.61E-04	0.00E+00	3.83E-07	0.00E+00	0.00E+00	1.71E-05	0.00E+00	0.00E+00	6.61E-04
3740	ALL		389800	3780550	NonCancer8HrChronic	0.00E+00	4.79E-05	0.00E+00	4.69E-05	0.00E+00	4.69E-05	6.53E-04	0.00E+00	3.80E-07	0.00E+00	0.00E+00	1.59E-05	0.00E+00	0.00E+00	6.53E-04
50	ALL		389908	3780725	NonCancer8HrChronic	0.00E+00	5.30E-05	0.00E+00	5.19E-05	0.00E+00	5.19E-05	6.50E-04	0.00E+00	3.72E-07	0.00E+00	0.00E+00	1.65E-05	0.00E+00	0.00E+00	6.50E-04
3673	ALL		389750	3780500	NonCancer8HrChronic	0.00E+00	5.00E-05	0.00E+00	4.90E-05	0.00E+00	4.90E-05	6.48E-04	0.00E+00	3.77E-07	0.00E+00	0.00E+00	1.61E-05	0.00E+00	0.00E+00	6.48E-04
3948	ALL		389850	3780700	NonCancer8HrChronic	0.00E+00	5.28E-05	0.00E+00	5.17E-05	0.00E+00	5.17E-05	6.47E-04	0.00E+00	3.63E-07	0.00E+00	0.00E+00	1.64E-05	0.00E+00	0.00E+00	6.47E-04
49	ALL		389941.5	3780739	NonCancer8HrChronic	0.00E+00	5.42E-05	0.00E+00	5.31E-05	0.00E+00	5.31E-05	6.47E-04	0.00E+00	3.72E-07	0.00E+00	0.00E+00	1.66E-05	0.00E+00	0.00E+00	6.47E-04
38	ALL		389776	3780518	NonCancer8HrChronic	0.00E+00	4.68E-05	0.00E+00	4.58E-05	0.00E+00	4.58E-05	6.37E-04	0.00E+00	3.73E-07	0.00E+00	0.00E+00	1.55E-05	0.00E+00	0.00E+00	6.37E-04
51	ALL		389884.5	3780759	NonCancer8HrChronic	0.00E+00	5.61E-05	0.00E+00	5.50E-05	0.00E+00	5.50E-05	6.34E-04	0.00E+00	3.44E-07	0.00E+00	0.00E+00	1.66E-05	0.00E+00	0.00E+00	6.34E-04
48	ALL		389975	3780752	NonCancer8HrChronic	0.00E+00	5.43E-05	0.00E+00	5.32E-05	0.00E+00	5.32E-05	6.30E-04	0.00E+00	3.65E-07	0.00E+00	0.00E+00	1.63E-05	0.00E+00	0.00E+00	6.30E-04
3808	ALL		389800	3780600	NonCancer8HrChronic	0.00E+00	4.71E-05	0.00E+00	4.61E-05	0.00E+00	4.61E-05	6.30E-04	0.00E+00	3.65E-07	0.00E+00	0.00E+00	1.54E-05	0.00E+00	0.00E+00	6.30E-04
39	ALL		389812	3780548	NonCancer8HrChronic	0.00E+00	4.54E-05	0.00E+00	4.44E-05	0.00E+00	4.44E-05	6.27E-04	0.00E+00	3.64E-07	0.00E+00	0.00E+00	1.52E-05	0.00E+00	0.00E+00	6.27E-04
35	ALL		389721	3780420	NonCancer8HrChronic	0.00E+00	4.66E-05	0.00E+00	4.56E-05	0.00E+00	4.56E-05	6.24E-04	0.00E+00	3.71E-07	0.00E+00	0.00E+00	1.53E-05	0.00E+00	0.00E+00	6.24E-04
3739	ALL		389750	3780550	NonCancer8HrChronic	0.00E+00	4.81E-05	0.00E+00	4.71E-05	0.00E+00	4.71E-05	6.19E-04	0.00E+00	3.58E-07	0.00E+00	0.00E+00	1.54E-05	0.00E+00	0.00E+00	6.19E-04
4017	ALL		389850	3780750	NonCancer8HrChronic	0.00E+00	5.30E-05	0.00E+00	5.20E-05	0.00E+00	5.20E-05	6.18E-04	0.00E+00	3.38E-07	0.00E+00	0.00E+00	1.60E-05	0.00E+00	0.00E+00	6.18E-04
3605	ALL		389700	3780450	NonCancer8HrChronic	0.00E+00	4.61E-05	0.00E+00	4.52E-05	0.00E+00	4.52E-05	6.00E-04	0.00E+00	3.57E-07	0.00E+00	0.00E+00	1.48E-05	0.00E+00	0.00E+00	6.00E-04
3672	ALL		389700	3780500	NonCancer8HrChronic	0.00E+00	4.58E-05	0.00E+00	4.48E-05	0.00E+00	4.48E-05	5.83E-04	0.00E+00	3.44E-07	0.00E+00	0.00E+00	1.45E-05	0.00E+00	0.00E+00	5.83E-04
4016	ALL		389800	3780750	NonCancer8HrChronic	0.00E+00	4.61E-05	0.00E+00	4.52E-05	0.00E+00	4.52E-05	5.68E-04	0.00E+00	3.21E-07	0.00E+00	0.00E+00	1.44E-05	0.00E+00	0.00E+00	5.68E-04
3877	ALL		389800	3780650	NonCancer8HrChronic	0.00E+00	4.20E-05	0.00E+00	4.11E-05	0.00E+00	4.11E-05	5.67E-04	0.00E+00	3.31E-07	0.00E+00	0.00E+00	1.38E-05	0.00E+00	0.00E+00	5.67E-04
20	ALL		389611.5	3780048	NonCancer8HrChronic	0.00E+00	3.46E-05	0.00E+00	3.37E-05	0.00E+00	3.37E-05	5.66E-04	0.00E+00	3.20E-07	0.00E+00	0.00E+00	1.29E-05	0.00E+00	0.00E+00	5.66E-04
21	ALL		389594	3780084	NonCancer8HrChronic	0.00E+00	3.52E-05	0.00E+00	3.43E-05	0.00E+00	3.43E-05	5.62E-04	0.00E+00	3.20E-07	0.00E+00	0.00E+00	1.29E-05	0.00E+00	0.00E+00	5.62E-04
19	ALL		389629	3780012	NonCancer8HrChronic	0.00E+00	3.34E-05	0.00E+00	3.26E-05	0.00E+00	3.26E-05	5.59E-04	0.00E+00	3.14E-07	0.00E+00	0.00E+00	1.26E-05	0.00E+00	0.00E+00	5.59E-04
3807	ALL		389750	3780600	NonCancer8HrChronic	0.00E+00	4.18E-05	0.00E+00	4.09E-05	0.00E+00	4.09E-05	5.58E-04	0.00E+00	3.27E-07	0.00E+00	0.00E+00	1.37E-05	0.00E+00	0.00E+00	5.58E-04
3947	ALL		389800	3780700	NonCancer8HrChronic	0.00E+00	4.15E-05	0.00E+00	4.06E-05	0.00E+00	4.06E-05	5.51E-04	0.00E+00	3.21E-07	0.00E+00	0.00E+00	1.35E-05	0.00E+00	0.00E+00	5.51E-04
3538	ALL		389650	3780400	NonCancer8HrChronic	0.00E+00	4.13E-05	0.00E+00	4.04E-05	0.00E+00	4.04E-05	5.50E-04	0.00E+00	3.31E-07	0.00E+00	0.00E+00	1.35E-05	0.00E+00	0.00E+00	5.50E-04
3090	ALL		389600	3780050	NonCancer8HrChronic	0.00E+00	3.35E-05	0.00E+00	3.27E-05	0.00E+00	3.27E-05	5.47E-04	0.00E+00	3.10E-07	0.00E+00	0.00E+00	1.25E-05	0.00E+00	0.00E+00	5.47E-04
22	ALL		389572.3	3780113	NonCancer8HrChronic	0.00E+00	3.47E-05	0.00E+00	3.39E-05	0.00E+00	3.39E-05	5.42E-04	0.00E+00	3.11E-07	0.00E+00	0.00E+00	1.25E-05	0.00E+00	0.00E+00	5.42E-04
3738	ALL		389700	3780550	NonCancer8HrChronic	0.00E+00	4.17E-05	0.00E+00	4.08E-05	0.00E+00	4.08E-05	5.41E-04	0.00E+00	3.20E-07	0.00E+00	0.00E+00	1.34E-05	0.00E+00	0.00E+00	5.41E-04
4082	ALL		389800	3780800	NonCancer8HrChronic	0.00E+00	4.87E-05	0.00E+00	4.78E-05	0.00E+00	4.78E-05	5.38E-04	0.00E+00	2.81E-07	0.00E+00	0.00E+00	1.42E-05	0.00E+00	0.00E+00	5.38E-04
18	ALL		389646.5	3779975	NonCancer8HrChronic	0.00E+00	3.18E-05	0.00E+00	3.10E-05	0.00E+00	3.10E-05	5.38E-04	0.00E+00	3.00E-07	0.00E+00	0.00E+00	1.21E-05	0.00E+00	0.00E+00	5.38E-04
53	ALL		389880.5	3780833	NonCancer8HrChronic	0.00E+00	5.01E-05	0.00E+00	4.91E-05	0.00E+00	4.91E-05	5.32E-04	0.00E+00	2.70E-07	0.00E+00	0.00E+00	1.43E-05	0.00E+00	0.00E+00	5.32E-04
3604	ALL		389650	3780450	NonCancer8HrChronic	0.00E+00	4.01E-05	0.00E+00	3.93E-05	0.00E+00	3.93E-05	5.26E-04	0.00E+00	3.17E-07	0.00E+00	0.00E+00	1.30E-05	0.00E+00	0.00E+00	5.26E-04
23	ALL		389550.7	3780143	NonCancer8HrChronic	0.00E+00	3.42E-05	0.00E+00	3.34E-05	0.00E+00	3.34E-05	5.22E-04	0.00E+00	3.02E-07	0.00E+00	0.00E+00	1.22E-05	0.00E+00	0.00E+00	5.22E-04
4015	ALL		389750	3780750	NonCancer8HrChronic	0.00E+00	4.11E-05	0.00E+00	4.03E-05	0.00E+00	4.03E-05	5.16E-04	0.00E+00	2.97E-07	0.00E+00	0.00E+00	1.29E-05	0.00E+00	0.00E+00	5.16E-04
4287	ALL		389950	3780950	NonCancer8HrChronic	0.00E+00	4.91E-05	0.00E+00	4.82E-05	0.00E+00	4.82E-05	5.10E-04	0.00E+00	2.77E-07	0.00E+00	0.00E+00	1.39E-05	0.00E+00	0.00E+00	5.10E-04
52	ALL		389861	3780792	NonCancer8HrChronic	0.00E+00	4.63E-05	0.00E+00	4.54E-05	0.00E+00	4.54E-05	5.08E-04	0.00E+00	2.51E-07	0.00E+00	0.00E+00	1.35E-05	0.00E+00	0.00E+00	5.08E-04
3155	ALL		389550	3780100	NonCancer8HrChronic	0.00E+00	3.22E-05	0.00E+00	3.14E-05	0.00E+00	3.14E-05	5.06E-04	0.00E+00	2.92E-07	0.00E+00	0.00E+00	1.17E-05	0.00E+00	0.00E+00	5.06E-04
34	ALL		389683	3780393	NonCancer8HrChronic	0.00E+00	3.84E-05	0.00E+00	3.76E-05	0.00E+00	3.76E-05	5.04E-04	0.00E+00	2.94E-07	0.00E+00	0.00E+00	1.24E-05	0.00E+00	0.00E+00	5.04E-04
33	ALL		389645	3780367	NonCancer8HrChronic	0.00E+00	3.76E-05	0.00E+00	3.68E-05	0.00E+00	3.68E-05	5.02E-04	0.00E+00	2.96E-07	0.00E+00	0.00E+00	1.23E-05	0.00E+00	0.00E+00	5.02E-04

ACUTE

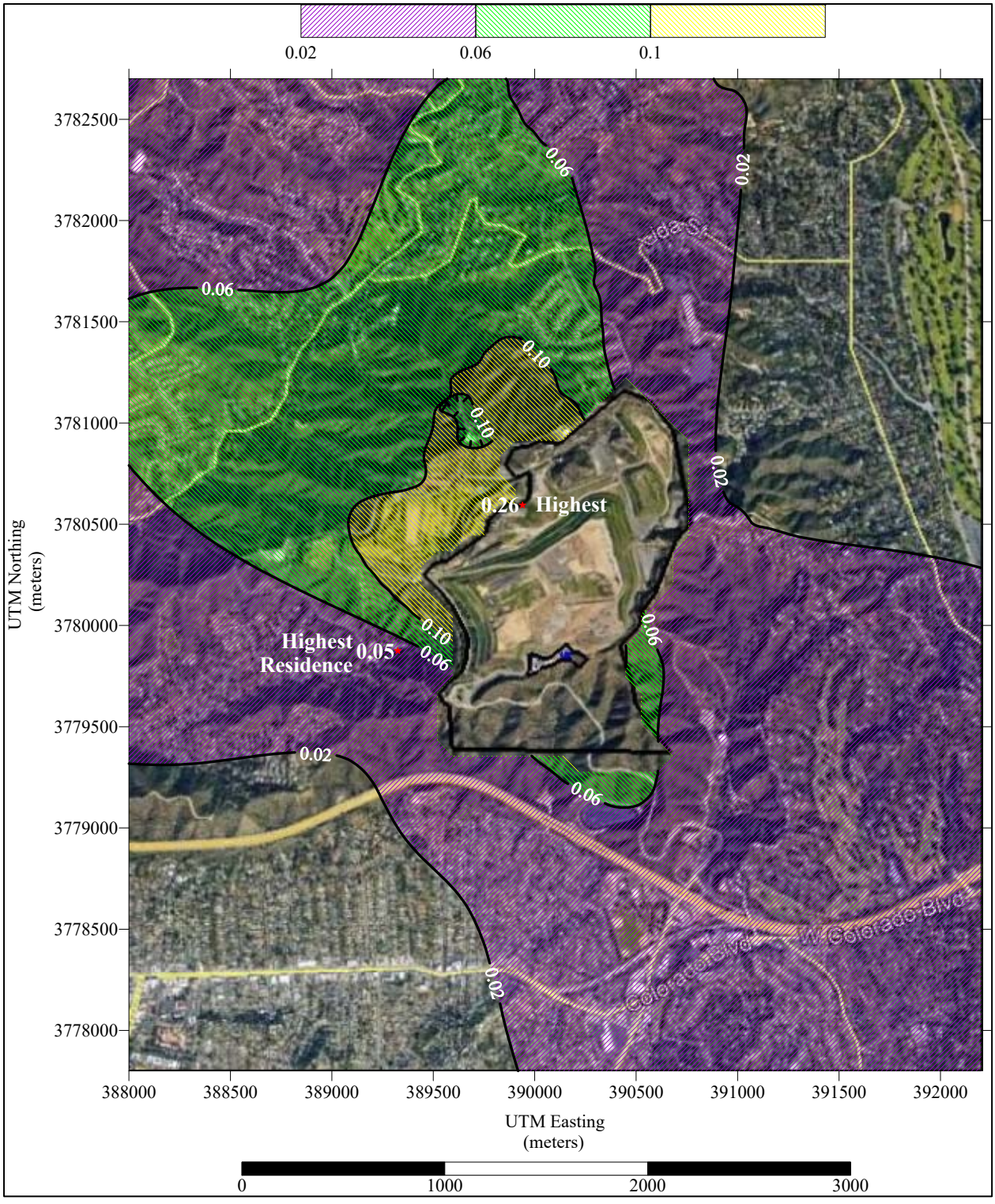
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REC	GRP	NETID	X	Y	SCENARIO	CV	CNS	IMMUN	KIDNEY	GILV	REPRO/DE\	RESP	SKIN	EYE	BONE/TEET	ENDO	BLOOD	ODOR	GENERAL	MAXHI
106	ALL		390419.6	3779834	NonCancer	0.00E+00	7.14E-04	8.49E-05	0.00E+00	2.40E-08	3.27E-04	2.64E-03	0.00E+00	7.58E-03	0.00E+00	0.00E+00	8.49E-05	0.00E+00	0.00E+00	7.58E-03
107	ALL		390432.2	3779792	NonCancer	0.00E+00	6.60E-04	7.92E-05	0.00E+00	2.26E-08	2.99E-04	2.39E-03	0.00E+00	7.08E-03	0.00E+00	0.00E+00	7.92E-05	0.00E+00	0.00E+00	7.08E-03
2822	ALL		390450	3779850	NonCancer	0.00E+00	6.47E-04	7.71E-05	0.00E+00	2.18E-08	2.95E-04	2.38E-03	0.00E+00	6.89E-03	0.00E+00	0.00E+00	7.71E-05	0.00E+00	0.00E+00	6.89E-03
108	ALL		390444.8	3779751	NonCancer	0.00E+00	6.21E-04	7.50E-05	0.00E+00	2.15E-08	2.79E-04	2.22E-03	0.00E+00	6.72E-03	0.00E+00	0.00E+00	7.50E-05	0.00E+00	0.00E+00	6.72E-03
2756	ALL		390450	3779800	NonCancer	0.00E+00	6.25E-04	7.49E-05	0.00E+00	2.13E-08	2.83E-04	2.27E-03	0.00E+00	6.70E-03	0.00E+00	0.00E+00	7.49E-05	0.00E+00	0.00E+00	6.70E-03
2690	ALL		390450	3779750	NonCancer	0.00E+00	6.13E-04	7.40E-05	0.00E+00	2.12E-08	2.75E-04	2.19E-03	0.00E+00	6.62E-03	0.00E+00	0.00E+00	7.40E-05	0.00E+00	0.00E+00	6.62E-03
105	ALL		390407	3779876	NonCancer	0.00E+00	6.54E-04	7.44E-05	0.00E+00	2.01E-08	3.14E-04	2.63E-03	0.00E+00	6.58E-03	0.00E+00	0.00E+00	7.44E-05	0.00E+00	0.00E+00	6.58E-03
16	ALL		389667	3779892	NonCancer	0.00E+00	5.16E-04	6.68E-05	0.00E+00	2.04E-08	2.11E-04	1.56E-03	0.00E+00	6.06E-03	0.00E+00	0.00E+00	6.68E-05	0.00E+00	0.00E+00	6.06E-03
2823	ALL		390500	3779850	NonCancer	0.00E+00	5.62E-04	6.69E-05	0.00E+00	1.89E-08	2.57E-04	2.07E-03	0.00E+00	5.98E-03	0.00E+00	0.00E+00	6.69E-05	0.00E+00	0.00E+00	5.98E-03
109	ALL		390457.4	3779709	NonCancer	0.00E+00	5.56E-04	6.68E-05	0.00E+00	1.91E-08	2.51E-04	2.01E-03	0.00E+00	5.98E-03	0.00E+00	0.00E+00	6.68E-05	0.00E+00	0.00E+00	5.98E-03
17	ALL		389664	3779939	NonCancer	0.00E+00	5.14E-04	6.54E-05	0.00E+00	1.97E-08	2.15E-04	1.62E-03	0.00E+00	5.92E-03	0.00E+00	0.00E+00	6.54E-05	0.00E+00	0.00E+00	5.92E-03
2821	ALL		389650	3779850	NonCancer	0.00E+00	5.07E-04	6.52E-05	0.00E+00	1.98E-08	2.09E-04	1.56E-03	0.00E+00	5.92E-03	0.00E+00	0.00E+00	6.52E-05	0.00E+00	0.00E+00	5.92E-03
2691	ALL		390500	3779750	NonCancer	0.00E+00	5.41E-04	6.51E-05	0.00E+00	1.86E-08	2.44E-04	1.96E-03	0.00E+00	5.83E-03	0.00E+00	0.00E+00	6.51E-05	0.00E+00	0.00E+00	5.83E-03
2757	ALL		390500	3779800	NonCancer	0.00E+00	5.46E-04	6.52E-05	0.00E+00	1.85E-08	2.49E-04	2.00E-03	0.00E+00	5.83E-03	0.00E+00	0.00E+00	6.52E-05	0.00E+00	0.00E+00	5.83E-03
2889	ALL		389650	3779900	NonCancer	0.00E+00	4.91E-04	6.33E-05	0.00E+00	1.92E-08	2.02E-04	1.50E-03	0.00E+00	5.74E-03	0.00E+00	0.00E+00	6.33E-05	0.00E+00	0.00E+00	5.74E-03
110	ALL		390470	3779667	NonCancer	0.00E+00	5.24E-04	6.38E-05	0.00E+00	1.85E-08	2.32E-04	1.84E-03	0.00E+00	5.73E-03	0.00E+00	0.00E+00	6.38E-05	0.00E+00	0.00E+00	5.73E-03
2957	ALL		389650	3779950	NonCancer	0.00E+00	4.96E-04	6.32E-05	0.00E+00	1.90E-08	2.08E-04	1.57E-03	0.00E+00	5.72E-03	0.00E+00	0.00E+00	6.32E-05	0.00E+00	0.00E+00	5.72E-03
14	ALL		389654	3779804	NonCancer	0.00E+00	4.79E-04	6.21E-05	0.00E+00	1.90E-08	1.95E-04	1.44E-03	0.00E+00	5.64E-03	0.00E+00	0.00E+00	6.21E-05	0.00E+00	0.00E+00	5.64E-03
2890	ALL		390450	3779900	NonCancer	0.00E+00	5.45E-04	6.34E-05	0.00E+00	1.75E-08	2.56E-04	2.11E-03	0.00E+00	5.63E-03	0.00E+00	0.00E+00	6.34E-05	0.00E+00	0.00E+00	5.63E-03
18	ALL		389646.5	3779975	NonCancer	0.00E+00	4.87E-04	6.22E-05	0.00E+00	1.87E-08	2.03E-04	1.53E-03	0.00E+00	5.63E-03	0.00E+00	0.00E+00	6.22E-05	0.00E+00	0.00E+00	5.63E-03
131	ALL		390067.2	3779358	NonCancer	0.00E+00	4.96E-04	6.18E-05	0.00E+00	1.82E-08	2.14E-04	1.65E-03	0.00E+00	5.57E-03	0.00E+00	0.00E+00	6.18E-05	0.00E+00	0.00E+00	5.57E-03
130	ALL		390115.5	3779357	NonCancer	0.00E+00	4.94E-04	6.14E-05	0.00E+00	1.81E-08	2.14E-04	1.66E-03	0.00E+00	5.53E-03	0.00E+00	0.00E+00	6.14E-05	0.00E+00	0.00E+00	5.53E-03
111	ALL		390471.5	3779634	NonCancer	0.00E+00	5.04E-04	6.14E-05	0.00E+00	1.78E-08	2.24E-04	1.77E-03	0.00E+00	5.51E-03	0.00E+00	0.00E+00	6.14E-05	0.00E+00	0.00E+00	5.51E-03
132	ALL		390018.9	3779360	NonCancer	0.00E+00	4.87E-04	6.10E-05	0.00E+00	1.81E-08	2.09E-04	1.61E-03	0.00E+00	5.50E-03	0.00E+00	0.00E+00	6.10E-05	0.00E+00	0.00E+00	5.50E-03
2755	ALL		389650	3779800	NonCancer	0.00E+00	4.67E-04	6.05E-05	0.00E+00	1.85E-08	1.91E-04	1.41E-03	0.00E+00	5.49E-03	0.00E+00	0.00E+00	6.05E-05	0.00E+00	0.00E+00	5.49E-03
133	ALL		389970.6	3779361	NonCancer	0.00E+00	4.81E-04	6.03E-05	0.00E+00	1.79E-08	2.06E-04	1.58E-03	0.00E+00	5.44E-03	0.00E+00	0.00E+00	6.03E-05	0.00E+00	0.00E+00	5.44E-03
2182	ALL		390050	3779350	NonCancer	0.00E+00	4.83E-04	6.03E-05	0.00E+00	1.78E-08	2.08E-04	1.60E-03	0.00E+00	5.44E-03	0.00E+00	0.00E+00	6.03E-05	0.00E+00	0.00E+00	5.44E-03
2183	ALL		390100	3779350	NonCancer	0.00E+00	4.85E-04	6.03E-05	0.00E+00	1.77E-08	2.10E-04	1.63E-03	0.00E+00	5.43E-03	0.00E+00	0.00E+00	6.03E-05	0.00E+00	0.00E+00	5.43E-03
2891	ALL		390500	3779900	NonCancer	0.00E+00	4.96E-04	6.03E-05	0.00E+00	1.74E-08	2.21E-04	1.75E-03	0.00E+00	5.41E-03	0.00E+00	0.00E+00	6.03E-05	0.00E+00	0.00E+00	5.41E-03
2625	ALL		390500	3779700	NonCancer	0.00E+00	5.07E-04	6.05E-05	0.00E+00	1.72E-08	2.31E-04	1.86E-03	0.00E+00	5.41E-03	0.00E+00	0.00E+00	6.05E-05	0.00E+00	0.00E+00	5.41E-03
129	ALL		390163.8	3779356	NonCancer	0.00E+00	4.83E-04	5.98E-05	0.00E+00	1.75E-08	2.10E-04	1.63E-03	0.00E+00	5.38E-03	0.00E+00	0.00E+00	5.98E-05	0.00E+00	0.00E+00	5.38E-03
112	ALL		390473	3779600	NonCancer	0.00E+00	4.97E-04	6.01E-05	0.00E+00	1.72E-08	2.23E-04	1.77E-03	0.00E+00	5.38E-03	0.00E+00	0.00E+00	6.01E-05	0.00E+00	0.00E+00	5.38E-03
2181	ALL		390000	3779350	NonCancer	0.00E+00	4.75E-04	5.94E-05	0.00E+00	1.76E-08	2.04E-04	1.57E-03	0.00E+00	5.36E-03	0.00E+00	0.00E+00	5.94E-05	0.00E+00	0.00E+00	5.36E-03
104	ALL		390438.3	3779909	NonCancer	0.00E+00	5.42E-04	6.07E-05	0.00E+00	1.61E-08	2.65E-04	2.24E-03	0.00E+00	5.36E-03	0.00E+00	0.00E+00	6.07E-05	0.00E+00	0.00E+00	5.36E-03
2184	ALL		390150	3779350	NonCancer	0.00E+00	4.77E-04	5.91E-05	0.00E+00	1.74E-08	2.08E-04	1.61E-03	0.00E+00	5.32E-03	0.00E+00	0.00E+00	5.91E-05	0.00E+00	0.00E+00	5.32E-03
2561	ALL		390500	3779650	NonCancer	0.00E+00	4.91E-04	5.93E-05	0.00E+00	1.70E-08	2.20E-04	1.75E-03	0.00E+00	5.32E-03	0.00E+00	0.00E+00	5.93E-05	0.00E+00	0.00E+00	5.32E-03
2820	ALL		389600	3779850	NonCancer	0.00E+00	4.57E-04	5.84E-05	0.00E+00	1.76E-08	1.91E-04	1.43E-03	0.00E+00	5.29E-03	0.00E+00	0.00E+00	5.84E-05	0.00E+00	0.00E+00	5.29E-03
19	ALL		389629	3780012	NonCancer	0.00E+00	4.52E-04	5.78E-05	0.00E+00	1.74E-08	1.88E-04	1.41E-03	0.00E+00	5.23E-03	0.00E+00	0.00E+00	5.78E-05	0.00E+00	0.00E+00	5.23E-03
128	ALL		390212.1	3779354	NonCancer	0.00E+00	4.73E-04	5.82E-05	0.00E+00	1.70E-08	2.07E-04	1.62E-03	0.00E+00	5.23E-03	0.00E+00	0.00E+00	5.82E-05	0.00E+00	0.00E+00	5.23E-03
2824	ALL		390550	3779850	NonCancer	0.00E+00	4.89E-04	5.83E-05	0.00E+00	1.65E-08	2.23E-04	1.80E-03	0.00E+00	5.21E-03	0.00E+00	0.00E+00	5.83E-05	0.00E+00	0.00E+00	5.21E-03
2185	ALL		390200	3779350	NonCancer	0.00E+00	4.70E-04	5.79E-05	0.00E+00	1.69E-08	2.06E-04	1.61E-03	0.00E+00	5.21E-03	0.00E+00	0.00E+00	5.79E-05	0.00E+00	0.00E+00	5.21E-03
2180	ALL		389950	3779350	NonCancer	0.00E+00	4.59E-04	5.76E-05	0.00E+00	1.71E-08	1.97E-04	1.51E-03	0.00E+00	5.19E-03	0.00E+00	0.00E+00	5.76E-05	0.00E+00	0.00E+00	5.19E-03
2758	ALL		390550	3779800	NonCancer	0.00E+00	4.84E-04	5.78E-05	0.00E+00	1.64E-08	2.21E-04	1.78E-03	0.00E+00	5.16E-03	0.00E+00	0.00E+00	5.78E-05	0.00E+00	0.00E+00	5.16E-03
134	ALL		389922.2	3779362	NonCancer	0.00E+00	4.55E-04	5.70E-05	0.00E+00	1.69E-08	1.94E-04	1.49E-03	0.00E+00	5.15E-03	0.00E+00	0.00E+00	5.70E-05	0.00E+00	0.00E+00	5.15E-03
135	ALL		389873.9	3779363	NonCancer	0.00E+00	4.53E-04	5.69E-05	0.00E+00	1.69E-08	1.93E-04	1.47E-03	0.00E+00	5.14E-03	0.00E+00	0.00E+00	5.69E-05	0.00E+00	0.00E+00	5.14E-03
2692	ALL		390550	3779750	NonCancer	0.00E+00	4.74E-04	5.70E-05	0.00E+00	1.63E-08	2.14E-04	1.71E-03	0.00E+00	5.10E-03	0.00E+00	0.00E+00	5.70E-05	0.00E+00	0.00E+00	5.10E-03
2179	ALL		389900	3779350	NonCancer	0.00E+00	4.47E-04	5.61E-05	0.00E+00	1.67E-08	1.91E-04	1.46E-03	0.00E+00	5.07E-03	0.00E+00	0.00E+00	5.61E-05	0.00E+00	0.00E+00	5.07E-03
2892	ALL		390550	3779900	NonCancer	0.00E+00	4.68E-04	5.63E-05	0.00E+00	1.61E-08	2.11E-04	1.69E-03	0.00E+00	5.04E-03	0.00E+00	0.00E+00	5.63E-05	0.00E+00	0.00E+00	5.04E-03
2498	ALL		390500	3779600	NonCancer	0.00E+00	4.66E-04	5.61E-05	0.00E+00	1.61E-08	2.10E-04	1.67E-03	0.00E+00	5.02E-03	0.00E+00	0.00E+00	5.61E-05	0.00E+00	0.00E+00	5.02E-03
2186	ALL		390250	3779350	NonCancer	0.00E+00	4.54E-04	5.57E-05	0.00E+00	1.62E-08	2.00E-04	1.56E-03	0.00E+00	5.01E-03	0.00E+00	0.00E+00	5.57E-05	0.00E+00	0.00E+00	5.01E-03
127	ALL		390260.5	3779353	NonCancer	0.00E+00	4.53E-04	5.55E-05	0.00E+00	1.62E-08	1.99E-04	1.56E-03	0.00E+00	4.99E-03	0.00E+00	0.00E+00	5.55E-05	0.00E+00	0.00E+00	4.99E-03
2626	ALL		390550	3779700	NonCancer	0.00E+00	4.61E-04	5.50E-05	0.00E+00	1.56E-08	2.10E-04	1.69E-03	0.00E+00	4.92E-03	0.00E+00	0.00E+00	5.50E-05	0.00E+00	0.00E+00	4.92E-03
3024	ALL		389600	3780000	NonCancer	0.00E+00	4.26E-04	5.43E-05	0.00E+00	1.63E-08	1.78E-04	1.34E-03	0.00E+00	4.91E-03	0.00E+00	0.00E+00	5.43E-05	0.00E+00	0.00E+00	4.91E-03

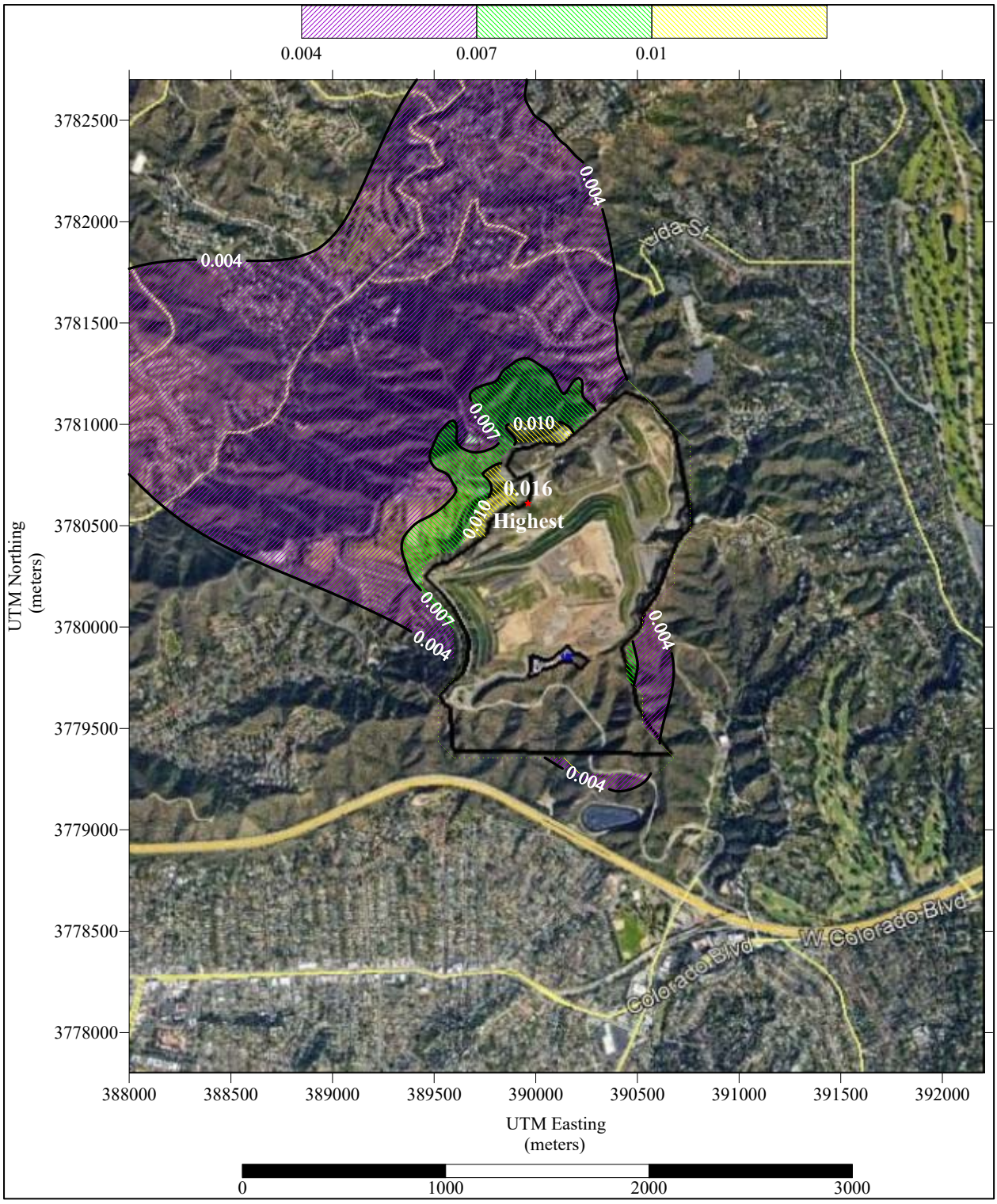
SITE MAPS SHOWING THE LOCATIONS OF MODELING RESULTS

CANCER RISK OUTPUT

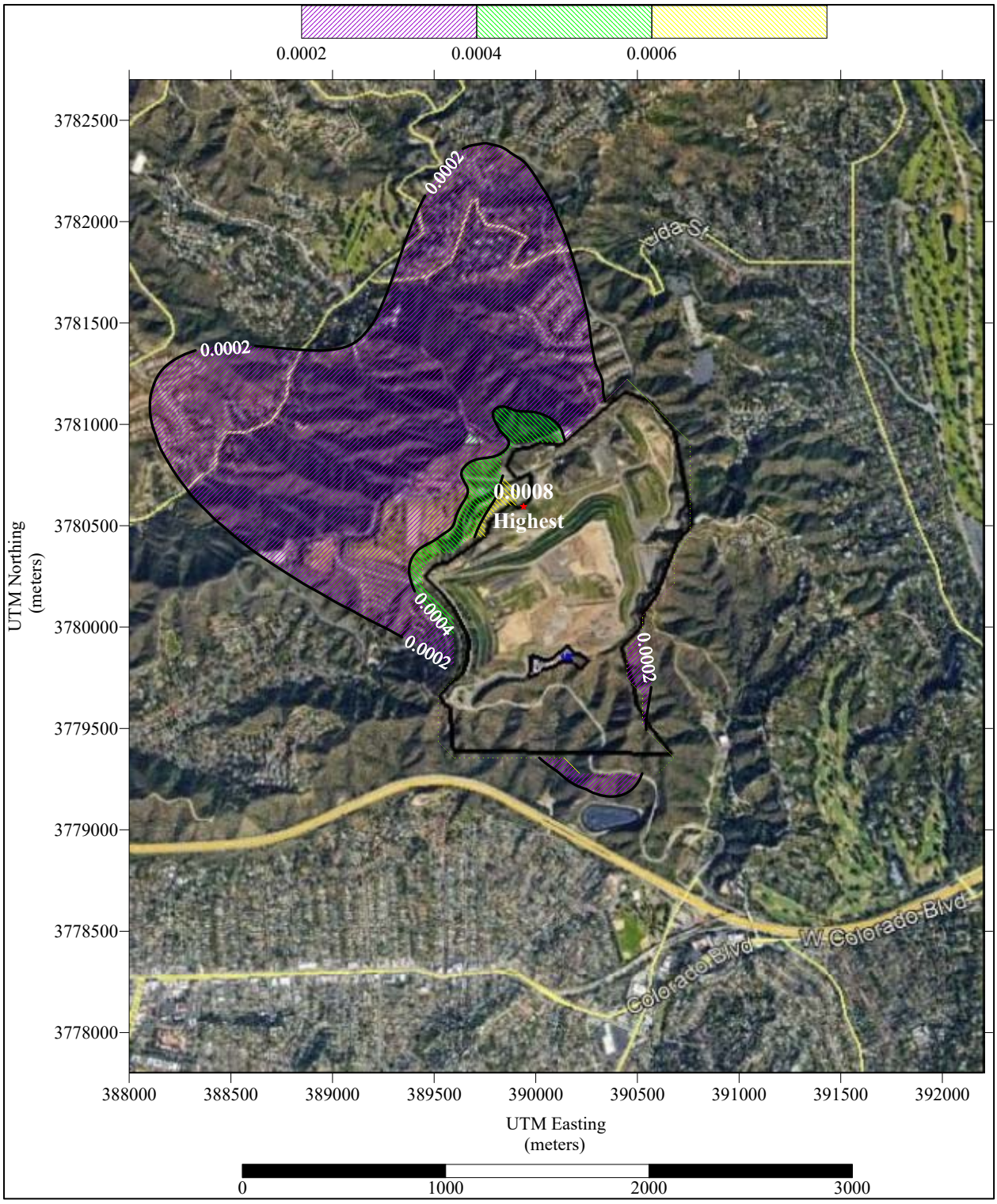
(UNIT OF MEASUREMENT: IN ONE MILLION)



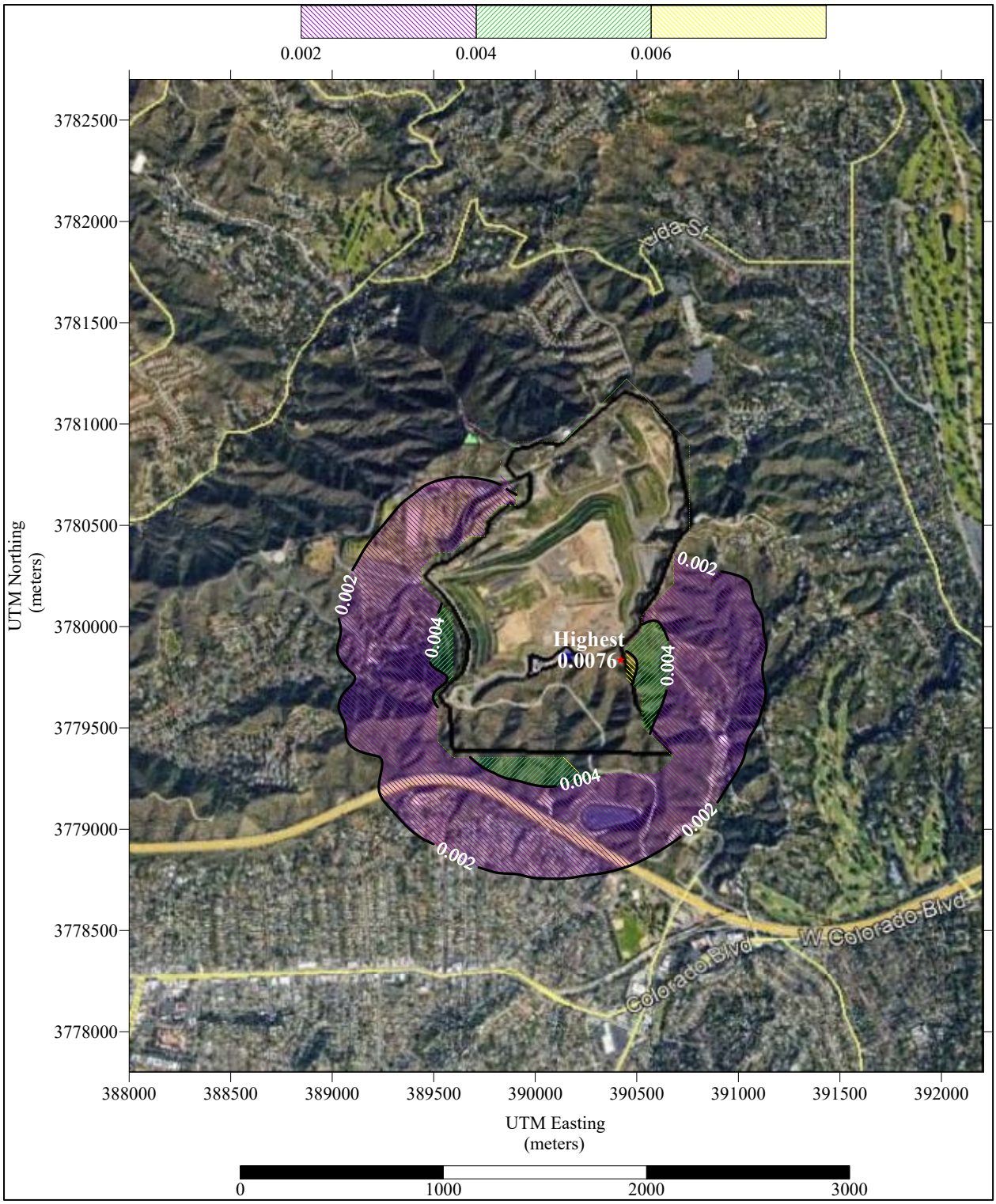
CHRONIC OUTPUT



CHRONIC 8-HOUR OUTPUT



ACUTE OUTPUT



POST LANDFILL CLOSURE

HRA RESULTS
(THE HIGHEST VALUES)

CANCER

*HARP - HRACalc v21081 5/4/2021 11:52:29 AM - Cancer Risk - Input File: C:\Work\Bee\Glendale CA\Scholl Canyon 2021\HRA\Inner\SCHOLL CANYON INNER BORDER\hra\CancerInnerHRAInput.hra

REC	GRP	NETID	X	Y	RISK_SUM	SCENARIO	INH_RISK	SOIL_RISK	DERMAL_R	MMILK_RIS	WATER_RI	FISH_RISK	CROP_RISK	BEEF_RISK	DAIRY_RISI	PIG_RISK	CHICKEN_F	EGG_RISK
725	ALL		390041	3779818	7.83E-06	30YrCancer	7.83E-06	2.82E-11	1.60E-12	3.37E-11	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
724	ALL		390023	3779825	2.66E-06	30YrCancer	2.66E-06	9.39E-12	5.32E-13	1.12E-11	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
168	ALL		390050	3779850	2.52E-06	30YrCancer	2.52E-06	8.77E-12	4.97E-13	1.05E-11	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
726	ALL		390048	3779817	2.21E-06	30YrCancer	2.21E-06	7.76E-12	4.39E-13	9.27E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
181	ALL		390050	3779900	2.00E-06	30YrCancer	2.00E-06	6.70E-12	3.79E-13	8.01E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
180	ALL		390000	3779900	1.77E-06	30YrCancer	1.77E-06	6.01E-12	3.40E-13	7.18E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
167	ALL		390000	3779850	1.72E-06	30YrCancer	1.72E-06	5.95E-12	3.37E-13	7.12E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
723	ALL		390005	3779831	1.61E-06	30YrCancer	1.61E-06	5.60E-12	3.17E-13	6.70E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
196	ALL		390050	3779950	1.48E-06	30YrCancer	1.48E-06	4.78E-12	2.70E-13	5.71E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
195	ALL		390000	3779950	1.44E-06	30YrCancer	1.44E-06	4.76E-12	2.70E-13	5.70E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
722	ALL		389987	3779838	1.25E-06	30YrCancer	1.25E-06	4.30E-12	2.43E-13	5.14E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
760	ALL		390045	3779776	1.23E-06	30YrCancer	1.23E-06	4.23E-12	2.39E-13	5.05E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
759	ALL		390059	3779780	1.22E-06	30YrCancer	1.22E-06	4.20E-12	2.38E-13	5.02E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
213	ALL		390050	3780000	1.14E-06	30YrCancer	1.14E-06	3.51E-12	1.99E-13	4.19E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
212	ALL		390000	3780000	1.13E-06	30YrCancer	1.13E-06	3.64E-12	2.06E-13	4.36E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
721	ALL		389969	3779844	1.01E-06	30YrCancer	1.01E-06	3.44E-12	1.95E-13	4.11E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
727	ALL		390057	3779818	9.95E-07	30YrCancer	9.95E-07	3.34E-12	1.89E-13	3.99E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
179	ALL		389950	3779900	9.82E-07	30YrCancer	9.82E-07	3.28E-12	1.86E-13	3.92E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
194	ALL		389950	3779950	9.36E-07	30YrCancer	9.36E-07	3.06E-12	1.73E-13	3.66E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
230	ALL		390000	3780050	9.06E-07	30YrCancer	9.06E-07	2.81E-12	1.59E-13	3.35E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
231	ALL		390050	3780050	9.03E-07	30YrCancer	9.03E-07	2.68E-12	1.52E-13	3.20E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
758	ALL		390075	3779786	8.67E-07	30YrCancer	8.67E-07	2.89E-12	1.64E-13	3.45E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
761	ALL		390024	3779772	8.57E-07	30YrCancer	8.57E-07	2.90E-12	1.64E-13	3.47E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
197	ALL		390100	3779950	8.45E-07	30YrCancer	8.45E-07	2.28E-12	1.29E-13	2.72E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
211	ALL		389950	3780000	8.36E-07	30YrCancer	8.36E-07	2.68E-12	1.52E-13	3.20E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
166	ALL		389950	3779850	8.25E-07	30YrCancer	8.25E-07	2.78E-12	1.58E-13	3.33E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
142	ALL		390050	3779750	8.20E-07	30YrCancer	8.20E-07	2.76E-12	1.56E-13	3.29E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
728	ALL		390065	3779824	8.15E-07	30YrCancer	8.15E-07	2.67E-12	1.51E-13	3.19E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
720	ALL		389966.5	3779830	8.11E-07	30YrCancer	8.11E-07	2.74E-12	1.55E-13	3.28E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
214	ALL		390100	3780000	8.01E-07	30YrCancer	8.01E-07	2.09E-12	1.19E-13	2.50E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
250	ALL		390050	3780100	7.53E-07	30YrCancer	7.53E-07	2.12E-12	1.20E-13	2.54E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
762	ALL		390016	3779767	7.46E-07	30YrCancer	7.46E-07	2.51E-12	1.42E-13	3.00E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
182	ALL		390100	3779900	7.44E-07	30YrCancer	7.44E-07	2.08E-12	1.18E-13	2.48E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
249	ALL		390000	3780100	7.41E-07	30YrCancer	7.41E-07	2.23E-12	1.26E-13	2.67E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
757	ALL		390089	3779793	7.22E-07	30YrCancer	7.22E-07	2.35E-12	1.33E-13	2.82E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
229	ALL		389950	3780050	7.21E-07	30YrCancer	7.21E-07	2.26E-12	1.28E-13	2.70E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
232	ALL		390100	3780050	7.04E-07	30YrCancer	7.04E-07	1.82E-12	1.03E-13	2.17E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
729	ALL		390081.5	3779837	6.86E-07	30YrCancer	6.86E-07	2.16E-12	1.22E-13	2.58E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
763	ALL		390009	3779758	6.46E-07	30YrCancer	6.46E-07	2.16E-12	1.22E-13	2.58E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
143	ALL		390100	3779750	6.42E-07	30YrCancer	6.42E-07	2.07E-12	1.17E-13	2.47E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
193	ALL		389900	3779950	6.32E-07	30YrCancer	6.32E-07	2.04E-12	1.16E-13	2.44E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
248	ALL		389950	3780100	6.26E-07	30YrCancer	6.26E-07	1.94E-12	1.10E-13	2.32E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
268	ALL		390000	3780150	6.24E-07	30YrCancer	6.24E-07	1.83E-12	1.04E-13	2.19E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
269	ALL		390050	3780150	6.22E-07	30YrCancer	6.22E-07	1.72E-12	9.76E-14	2.06E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
719	ALL		389964	3779816	6.22E-07	30YrCancer	6.22E-07	2.07E-12	1.17E-13	2.47E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
756	ALL		390107	3779805	6.20E-07	30YrCancer	6.20E-07	2.01E-12	1.14E-13	2.40E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
178	ALL		389900	3779900	6.15E-07	30YrCancer	6.15E-07	2.02E-12	1.15E-13	2.42E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

CHRONIC

*HARP - HRACalc v21081 5/4/2021 11:58:06 AM - Chronic Risk - Input File: C:\Work\Bee\Glendale CA\Scholl Canyon 2021\HRA\Inner\SCHOLL CANYON INNER BORDER\hra\ChronicInnerHRAInput.hra

REC	GRP	NETID	X	Y	SCENARIO	CV	CNS	IMMUN	KIDNEY	GILV	REPRO/DE\	RESP	SKIN	EYE	BONE/TEE	ENDO	BLOOD	ODOR	GENERAL	MAXHI
725	ALL		390041	3779818	NonCancer	0.00E+00	3.51E-03	0.00E+00	3.48E-03	1.37E-05	3.58E-03	1.75E-01	0.00E+00	2.24E-05	0.00E+00	1.88E-06	5.10E-04	0.00E+00	0.00E+00	1.75E-01
168	ALL		390050	3779850	NonCancer	0.00E+00	1.47E-03	0.00E+00	1.46E-03	5.32E-06	1.49E-03	7.03E-02	0.00E+00	9.77E-06	0.00E+00	6.18E-07	1.68E-04	0.00E+00	0.00E+00	7.03E-02
181	ALL		390050	3779900	NonCancer	0.00E+00	1.47E-03	0.00E+00	1.46E-03	5.21E-06	1.49E-03	6.83E-02	0.00E+00	1.06E-05	0.00E+00	5.01E-07	1.38E-04	0.00E+00	0.00E+00	6.83E-02
724	ALL		390023	3779825	NonCancer	0.00E+00	1.40E-03	0.00E+00	1.39E-03	5.07E-06	1.42E-03	6.79E-02	0.00E+00	8.78E-06	0.00E+00	6.46E-07	1.76E-04	0.00E+00	0.00E+00	6.79E-02
196	ALL		390050	3779950	NonCancer	0.00E+00	1.35E-03	0.00E+00	1.34E-03	3.97E-06	1.36E-03	6.12E-02	0.00E+00	8.23E-06	0.00E+00	3.82E-07	1.06E-04	0.00E+00	0.00E+00	6.12E-02
726	ALL		390048	3779817	NonCancer	0.00E+00	1.23E-03	0.00E+00	1.22E-03	3.88E-06	1.25E-03	5.92E-02	0.00E+00	6.45E-06	0.00E+00	5.40E-07	1.47E-04	0.00E+00	0.00E+00	5.92E-02
214	ALL		390100	3780000	NonCancer	0.00E+00	1.32E-03	0.00E+00	1.32E-03	2.07E-06	1.33E-03	5.76E-02	0.00E+00	4.56E-06	0.00E+00	2.29E-07	6.51E-05	0.00E+00	0.00E+00	5.76E-02
197	ALL		390100	3779950	NonCancer	0.00E+00	1.31E-03	0.00E+00	1.31E-03	2.23E-06	1.32E-03	5.73E-02	0.00E+00	4.87E-06	0.00E+00	2.38E-07	6.76E-05	0.00E+00	0.00E+00	5.73E-02
180	ALL		390000	3779900	NonCancer	0.00E+00	1.21E-03	0.00E+00	1.20E-03	4.51E-06	1.22E-03	5.65E-02	0.00E+00	9.02E-06	0.00E+00	4.40E-07	1.20E-04	0.00E+00	0.00E+00	5.65E-02
213	ALL		390050	3780000	NonCancer	0.00E+00	1.23E-03	0.00E+00	1.22E-03	3.01E-06	1.24E-03	5.50E-02	0.00E+00	6.32E-06	0.00E+00	3.01E-07	8.37E-05	0.00E+00	0.00E+00	5.50E-02
195	ALL		390000	3779950	NonCancer	0.00E+00	1.15E-03	0.00E+00	1.14E-03	3.79E-06	1.16E-03	5.28E-02	0.00E+00	7.74E-06	0.00E+00	3.65E-07	1.00E-04	0.00E+00	0.00E+00	5.28E-02
215	ALL		390150	3780000	NonCancer	0.00E+00	1.21E-03	0.00E+00	1.21E-03	1.23E-06	1.22E-03	5.20E-02	0.00E+00	2.87E-06	0.00E+00	1.59E-07	4.61E-05	0.00E+00	0.00E+00	5.20E-02
232	ALL		390100	3780050	NonCancer	0.00E+00	1.19E-03	0.00E+00	1.19E-03	1.80E-06	1.20E-03	5.20E-02	0.00E+00	3.96E-06	0.00E+00	2.03E-07	5.77E-05	0.00E+00	0.00E+00	5.20E-02
198	ALL		390150	3779950	NonCancer	0.00E+00	1.19E-03	0.00E+00	1.19E-03	1.19E-06	1.19E-03	5.11E-02	0.00E+00	2.79E-06	0.00E+00	1.54E-07	4.49E-05	0.00E+00	0.00E+00	5.11E-02
167	ALL		390000	3779850	NonCancer	0.00E+00	1.04E-03	0.00E+00	1.04E-03	4.03E-06	1.06E-03	4.96E-02	0.00E+00	7.75E-06	0.00E+00	4.23E-07	1.15E-04	0.00E+00	0.00E+00	4.96E-02
231	ALL		390050	3780050	NonCancer	0.00E+00	1.10E-03	0.00E+00	1.10E-03	2.36E-06	1.11E-03	4.88E-02	0.00E+00	4.99E-06	0.00E+00	2.43E-07	6.81E-05	0.00E+00	0.00E+00	4.88E-02
251	ALL		390100	3780100	NonCancer	0.00E+00	1.12E-03	0.00E+00	1.12E-03	1.53E-06	1.13E-03	4.88E-02	0.00E+00	3.40E-06	0.00E+00	1.79E-07	5.13E-05	0.00E+00	0.00E+00	4.88E-02
233	ALL		390150	3780050	NonCancer	0.00E+00	1.13E-03	0.00E+00	1.13E-03	1.16E-06	1.14E-03	4.87E-02	0.00E+00	2.68E-06	0.00E+00	1.49E-07	4.34E-05	0.00E+00	0.00E+00	4.87E-02
212	ALL		390000	3780000	NonCancer	0.00E+00	1.03E-03	0.00E+00	1.03E-03	2.98E-06	1.04E-03	4.69E-02	0.00E+00	6.16E-06	0.00E+00	2.92E-07	8.08E-05	0.00E+00	0.00E+00	4.69E-02
182	ALL		390100	3779900	NonCancer	0.00E+00	1.07E-03	0.00E+00	1.06E-03	1.97E-06	1.07E-03	4.69E-02	0.00E+00	4.28E-06	0.00E+00	2.07E-07	5.83E-05	0.00E+00	0.00E+00	4.69E-02
747	ALL		390227.3	3779791	NonCancer	0.00E+00	1.09E-03	0.00E+00	1.08E-03	1.13E-06	1.09E-03	4.67E-02	0.00E+00	2.62E-06	0.00E+00	1.45E-07	4.20E-05	0.00E+00	0.00E+00	4.67E-02
250	ALL		390050	3780100	NonCancer	0.00E+00	1.05E-03	0.00E+00	1.05E-03	1.94E-06	1.06E-03	4.63E-02	0.00E+00	4.15E-06	0.00E+00	2.08E-07	5.86E-05	0.00E+00	0.00E+00	4.63E-02
723	ALL		390005	3779831	NonCancer	0.00E+00	9.63E-04	0.00E+00	9.57E-04	3.56E-06	9.77E-04	4.59E-02	0.00E+00	6.69E-06	0.00E+00	3.96E-07	1.08E-04	0.00E+00	0.00E+00	4.59E-02
252	ALL		390150	3780100	NonCancer	0.00E+00	1.06E-03	0.00E+00	1.06E-03	1.07E-06	1.07E-03	4.57E-02	0.00E+00	2.48E-06	0.00E+00	1.40E-07	4.06E-05	0.00E+00	0.00E+00	4.57E-02
746	ALL		390239	3779803	NonCancer	0.00E+00	1.05E-03	0.00E+00	1.05E-03	1.06E-06	1.05E-03	4.50E-02	0.00E+00	2.46E-06	0.00E+00	1.37E-07	3.98E-05	0.00E+00	0.00E+00	4.50E-02
230	ALL		390000	3780050	NonCancer	0.00E+00	9.60E-04	0.00E+00	9.56E-04	2.36E-06	9.67E-04	4.31E-02	0.00E+00	4.92E-06	0.00E+00	2.39E-07	6.64E-05	0.00E+00	0.00E+00	4.31E-02
270	ALL		390100	3780150	NonCancer	0.00E+00	9.61E-04	0.00E+00	9.58E-04	1.32E-06	9.65E-04	4.17E-02	0.00E+00	2.93E-06	0.00E+00	1.54E-07	4.40E-05	0.00E+00	0.00E+00	4.17E-02
269	ALL		390050	3780150	NonCancer	0.00E+00	9.05E-04	0.00E+00	9.02E-04	1.59E-06	9.10E-04	3.98E-02	0.00E+00	3.43E-06	0.00E+00	1.73E-07	4.89E-05	0.00E+00	0.00E+00	3.98E-02
216	ALL		390200	3780000	NonCancer	0.00E+00	9.20E-04	0.00E+00	9.18E-04	7.44E-07	9.22E-04	3.93E-02	0.00E+00	1.79E-06	0.00E+00	1.07E-07	3.14E-05	0.00E+00	0.00E+00	3.93E-02
249	ALL		390000	3780100	NonCancer	0.00E+00	8.60E-04	0.00E+00	8.56E-04	1.92E-06	8.66E-04	3.83E-02	0.00E+00	4.03E-06	0.00E+00	1.98E-07	5.53E-05	0.00E+00	0.00E+00	3.83E-02
271	ALL		390150	3780150	NonCancer	0.00E+00	8.87E-04	0.00E+00	8.85E-04	9.60E-07	8.89E-04	3.81E-02	0.00E+00	2.20E-06	0.00E+00	1.22E-07	3.52E-05	0.00E+00	0.00E+00	3.81E-02
722	ALL		389987	3779838	NonCancer	0.00E+00	8.02E-04	0.00E+00	7.97E-04	3.01E-06	8.12E-04	3.78E-02	0.00E+00	5.87E-06	0.00E+00	3.09E-07	8.46E-05	0.00E+00	0.00E+00	3.78E-02
759	ALL		390059	3779780	NonCancer	0.00E+00	8.00E-04	0.00E+00	7.96E-04	2.51E-06	8.11E-04	3.77E-02	0.00E+00	4.58E-06	0.00E+00	3.04E-07	8.31E-05	0.00E+00	0.00E+00	3.77E-02
234	ALL		390200	3780050	NonCancer	0.00E+00	8.80E-04	0.00E+00	8.78E-04	7.26E-07	8.82E-04	3.76E-02	0.00E+00	1.74E-06	0.00E+00	1.03E-07	3.03E-05	0.00E+00	0.00E+00	3.76E-02
183	ALL		390150	3779900	NonCancer	0.00E+00	8.69E-04	0.00E+00	8.67E-04	1.05E-06	8.72E-04	3.75E-02	0.00E+00	2.39E-06	0.00E+00	1.26E-07	3.64E-05	0.00E+00	0.00E+00	3.75E-02
760	ALL		390045	3779776	NonCancer	0.00E+00	7.84E-04	0.00E+00	7.79E-04	2.52E-06	7.95E-04	3.70E-02	0.00E+00	4.60E-06	0.00E+00	3.04E-07	8.31E-05	0.00E+00	0.00E+00	3.70E-02
194	ALL		389950	3779950	NonCancer	0.00E+00	7.95E-04	0.00E+00	7.91E-04	2.47E-06	8.03E-04	3.64E-02	0.00E+00	5.06E-06	0.00E+00	2.39E-07	6.60E-05	0.00E+00	0.00E+00	3.64E-02
291	ALL		390100	3780200	NonCancer	0.00E+00	8.13E-04	0.00E+00	8.11E-04	1.14E-06	8.16E-04	3.53E-02	0.00E+00	2.52E-06	0.00E+00	1.32E-07	3.77E-05	0.00E+00	0.00E+00	3.53E-02
211	ALL		389950	3780000	NonCancer	0.00E+00	7.76E-04	0.00E+00	7.72E-04	2.20E-06	7.82E-04	3.52E-02	0.00E+00	4.54E-06	0.00E+00	2.16E-07	5.98E-05	0.00E+00	0.00E+00	3.52E-02
268	ALL		390000	3780150	NonCancer	0.00E+00	7.83E-04	0.00E+00	7.80E-04	1.61E-06	7.88E-04	3.47E-02	0.00E+00	3.41E-06	0.00E+00	1.69E-07	4.74E-05	0.00E+00	0.00E+00	3.47E-02
727	ALL		390057	3779818	NonCancer	0.00E+00	7.47E-04	0.00E+00	7.43E-04	1.82E-06	7.56E-04	3.46E-02	0.00E+00	3.19E-06	0.00E+00	2.51E-07	6.88E-05	0.00E+00	0.00E+00	3.46E-02
179	ALL		389950	3779900	NonCancer	0.00E+00	7.46E-04	0.00E+00	7.41E-04	2.57E-06	7.54E-04	3.45E-02	0.00E+00	5.23E-06	0.00E+00	2.47E-07	6.80E-05	0.00E+00	0.00E+00	3.45E-02
199	ALL		390200	3779950	NonCancer	0.00E+00	8.01E-04	0.00E+00	7.99E-04	7.24E-07	8.03E-04	3.43E-02	0.00E+00	1.71E-06	0.00E+00	9.88E-08	2.89E-05	0.00E+00	0.00E+00	3.43E-02
290	ALL		390050	3780200	NonCancer	0.00E+00	7.81E-04	0.00E+00	7.78E-04	1.34E-06	7.85E-04	3.43E-02	0.00E+00	2.90E-06	0.00E+00	1.47E-07	4.15E-05	0.00E+00	0.00E+00	3.43E-02
253	ALL		390200	3780100	NonCancer	0.00E+00	7.84E-04	0.00E+00	7.82E-04	6.85E-07	7.86E-04	3.35E-02	0.00E+00	1.63E-06	0.00E+00	9.48E-08	2.78E-05	0.00E+00	0.00E+00	3.35E-02
733	ALL		390130	3779879	NonCancer	0.00E+00	7.63E-04	0.00E+00	7.60E-04	1.20E-06	7.66E-04	3.33E-02	0.00E+00	2.64E-06	0.00E+00	1.32E-07	3.74E-05	0.00E+00	0.00E+00	3.33E-02
229	ALL		389950	3780050	NonCancer	0.00E+00	7.29E-04	0.00E+00	7.26E-04	1.88E-06	7.34E-04	3.28E-02	0.00E+00	3.91E-06	0.00E+00	1.88E-07	5.23E-05	0.00E+00	0.00E+00	3.28E-02
292	ALL		390150	3780200	NonCancer	0.00E+00	7.50E-04	0.00E+00	7.49E-04	8.60E-07	7.53E-04	3.23E-02	0.00E+00	1.96E-06	0.00E+00	1.07E-07	3.08E-05	0.00E+00	0.00E+00	3.23E-02
721	ALL		389969	3779844	NonCancer	0.00E+00	6.87E-04	0.00E+00	6.83E-04	2.55E-06	6.95E-04	3.22E-02	0.00E+00	5.08E-06	0.00E+00	2.51E-07	6.89E-05	0.00E+00	0.00E+00	3.22E-02
734	ALL		390145	3779885	NonCancer	0.00E+00	7.40E-04	0.00E+00	7.38E-04	1.06E-06	7.43E-04	3.22E-02	0.00E+00	2.37E-06	0.00E+00	1.20E-07	3.44E-05	0.00E+00	0.00E+00	3.22E-02
728	ALL		390065	3779824	NonCancer	0.00E+00	6.92E-04	0.00E+00	6.89E-04	1.68E-06	7.00E-04	3.17E-02	0.00E+00	3.15E-06	0.00E+00	2.08E-07	5.75E-05	0.00E+00	0.00E+00	3.17E-02
731	ALL		390114.5	3779862	NonCancer	0.00E+00	7.18E-04	0.00E+00	7.16E-04	1.37E-06	7.22E-04	3.17E-02	0.00E+00	2.95E-06	0.00E+00	1.43E-07	4.02E-05	0.00E+00	0.00E+00	3.17E-02
732	ALL		390131	3779875	NonCancer	0.00E+00	7.19E-04	0.00E+00	7.17E-04	1.18E-06	7.22E-04	3.14E-02	0.00E+00	2.59E-06	0.00E+00	1.28E-07	3.63E-05	0.00E+00	0.00E+00	3.14E-02

CHRONIC 8-HR

*HARP - HRACalc v21081 5/4/2021 12:14:53 PM - Chronic 8Hr Risk - Input File: C:\Work\Bee\Glendale CA\Scholl Canyon 2021\HRA\Inner\SCHOLL CANYON INNER BORDER\hra\Chronic8InnerHRAInput.hra

REC	GRP	NETID	X	Y	SCENARIO	CV	CNS	IMMUN	KIDNEY	GILV	REPRO/DE\	RESP	SKIN	EYE	BONE/TEE	ENDO	BLOOD	ODOR	GENERAL	MAXHI
725	ALL		390041	3779818	NonCancer	0.00E+00	6.46E-04	0.00E+00	6.12E-04	0.00E+00	6.12E-04	2.83E-02	0.00E+00	6.94E-06	0.00E+00	0.00E+00	5.10E-04	0.00E+00	0.00E+00	2.83E-02
724	ALL		390023	3779825	NonCancer	0.00E+00	2.56E-04	0.00E+00	2.44E-04	0.00E+00	2.44E-04	9.49E-03	0.00E+00	2.73E-06	0.00E+00	0.00E+00	1.76E-04	0.00E+00	0.00E+00	9.49E-03
168	ALL		390050	3779850	NonCancer	0.00E+00	2.68E-04	0.00E+00	2.57E-04	0.00E+00	2.57E-04	8.91E-03	0.00E+00	3.03E-06	0.00E+00	0.00E+00	1.68E-04	0.00E+00	0.00E+00	8.91E-03
726	ALL		390048	3779817	NonCancer	0.00E+00	2.25E-04	0.00E+00	2.15E-04	0.00E+00	2.15E-04	7.86E-03	0.00E+00	2.00E-06	0.00E+00	0.00E+00	1.47E-04	0.00E+00	0.00E+00	7.86E-03
181	ALL		390050	3779900	NonCancer	0.00E+00	2.66E-04	0.00E+00	2.57E-04	0.00E+00	2.57E-04	6.88E-03	0.00E+00	3.28E-06	0.00E+00	0.00E+00	1.38E-04	0.00E+00	0.00E+00	6.88E-03
180	ALL		390000	3779900	NonCancer	0.00E+00	2.19E-04	0.00E+00	2.11E-04	0.00E+00	2.11E-04	6.15E-03	0.00E+00	2.80E-06	0.00E+00	0.00E+00	1.20E-04	0.00E+00	0.00E+00	6.15E-03
167	ALL		390000	3779850	NonCancer	0.00E+00	1.90E-04	0.00E+00	1.82E-04	0.00E+00	1.82E-04	6.05E-03	0.00E+00	2.41E-06	0.00E+00	0.00E+00	1.15E-04	0.00E+00	0.00E+00	6.05E-03
723	ALL		390005	3779831	NonCancer	0.00E+00	1.75E-04	0.00E+00	1.68E-04	0.00E+00	1.68E-04	5.69E-03	0.00E+00	2.08E-06	0.00E+00	0.00E+00	1.08E-04	0.00E+00	0.00E+00	5.69E-03
196	ALL		390050	3779950	NonCancer	0.00E+00	2.43E-04	0.00E+00	2.36E-04	0.00E+00	2.36E-04	4.97E-03	0.00E+00	2.55E-06	0.00E+00	0.00E+00	1.06E-04	0.00E+00	0.00E+00	4.97E-03
195	ALL		390000	3779950	NonCancer	0.00E+00	2.07E-04	0.00E+00	2.01E-04	0.00E+00	2.01E-04	4.92E-03	0.00E+00	2.40E-06	0.00E+00	0.00E+00	1.00E-04	0.00E+00	0.00E+00	4.92E-03
722	ALL		389987	3779838	NonCancer	0.00E+00	1.46E-04	0.00E+00	1.40E-04	0.00E+00	1.40E-04	4.38E-03	0.00E+00	1.82E-06	0.00E+00	0.00E+00	8.45E-05	0.00E+00	0.00E+00	4.38E-03
760	ALL		390045	3779776	NonCancer	0.00E+00	1.43E-04	0.00E+00	1.37E-04	0.00E+00	1.37E-04	4.31E-03	0.00E+00	1.43E-06	0.00E+00	0.00E+00	8.30E-05	0.00E+00	0.00E+00	4.31E-03
759	ALL		390059	3779780	NonCancer	0.00E+00	1.45E-04	0.00E+00	1.40E-04	0.00E+00	1.40E-04	4.29E-03	0.00E+00	1.42E-06	0.00E+00	0.00E+00	8.31E-05	0.00E+00	0.00E+00	4.29E-03
212	ALL		390000	3780000	NonCancer	0.00E+00	1.86E-04	0.00E+00	1.81E-04	0.00E+00	1.81E-04	3.80E-03	0.00E+00	1.91E-06	0.00E+00	0.00E+00	8.07E-05	0.00E+00	0.00E+00	3.80E-03
213	ALL		390050	3780000	NonCancer	0.00E+00	2.21E-04	0.00E+00	2.15E-04	0.00E+00	2.15E-04	3.71E-03	0.00E+00	1.96E-06	0.00E+00	0.00E+00	8.37E-05	0.00E+00	0.00E+00	3.71E-03
721	ALL		389969	3779844	NonCancer	0.00E+00	1.25E-04	0.00E+00	1.20E-04	0.00E+00	1.20E-04	3.52E-03	0.00E+00	1.58E-06	0.00E+00	0.00E+00	6.88E-05	0.00E+00	0.00E+00	3.52E-03
727	ALL		390057	3779818	NonCancer	0.00E+00	1.35E-04	0.00E+00	1.31E-04	0.00E+00	1.31E-04	3.43E-03	0.00E+00	9.91E-07	0.00E+00	0.00E+00	6.88E-05	0.00E+00	0.00E+00	3.43E-03
179	ALL		389950	3779900	NonCancer	0.00E+00	1.35E-04	0.00E+00	1.30E-04	0.00E+00	1.30E-04	3.37E-03	0.00E+00	1.62E-06	0.00E+00	0.00E+00	6.80E-05	0.00E+00	0.00E+00	3.37E-03
194	ALL		389950	3779950	NonCancer	0.00E+00	1.44E-04	0.00E+00	1.39E-04	0.00E+00	1.39E-04	3.17E-03	0.00E+00	1.57E-06	0.00E+00	0.00E+00	6.59E-05	0.00E+00	0.00E+00	3.17E-03
758	ALL		390075	3779786	NonCancer	0.00E+00	1.22E-04	0.00E+00	1.18E-04	0.00E+00	1.18E-04	2.98E-03	0.00E+00	1.15E-06	0.00E+00	0.00E+00	6.02E-05	0.00E+00	0.00E+00	2.98E-03
761	ALL		390024	3779772	NonCancer	0.00E+00	1.10E-04	0.00E+00	1.06E-04	0.00E+00	1.06E-04	2.97E-03	0.00E+00	1.16E-06	0.00E+00	0.00E+00	5.87E-05	0.00E+00	0.00E+00	2.97E-03
230	ALL		390000	3780050	NonCancer	0.00E+00	1.73E-04	0.00E+00	1.68E-04	0.00E+00	1.68E-04	2.96E-03	0.00E+00	1.53E-06	0.00E+00	0.00E+00	6.64E-05	0.00E+00	0.00E+00	2.96E-03
231	ALL		390050	3780050	NonCancer	0.00E+00	1.98E-04	0.00E+00	1.93E-04	0.00E+00	1.93E-04	2.87E-03	0.00E+00	1.55E-06	0.00E+00	0.00E+00	6.81E-05	0.00E+00	0.00E+00	2.87E-03
166	ALL		389950	3779850	NonCancer	0.00E+00	1.07E-04	0.00E+00	1.04E-04	0.00E+00	1.04E-04	2.85E-03	0.00E+00	1.33E-06	0.00E+00	0.00E+00	5.66E-05	0.00E+00	0.00E+00	2.85E-03
142	ALL		390050	3779750	NonCancer	0.00E+00	1.10E-04	0.00E+00	1.06E-04	0.00E+00	1.06E-04	2.83E-03	0.00E+00	1.20E-06	0.00E+00	0.00E+00	5.66E-05	0.00E+00	0.00E+00	2.83E-03
720	ALL		389966.5	3779830	NonCancer	0.00E+00	1.05E-04	0.00E+00	1.01E-04	0.00E+00	1.01E-04	2.81E-03	0.00E+00	1.28E-06	0.00E+00	0.00E+00	5.57E-05	0.00E+00	0.00E+00	2.81E-03
211	ALL		389950	3780000	NonCancer	0.00E+00	1.40E-04	0.00E+00	1.36E-04	0.00E+00	1.36E-04	2.79E-03	0.00E+00	1.41E-06	0.00E+00	0.00E+00	5.98E-05	0.00E+00	0.00E+00	2.79E-03
728	ALL		390065	3779824	NonCancer	0.00E+00	1.25E-04	0.00E+00	1.21E-04	0.00E+00	1.21E-04	2.76E-03	0.00E+00	9.78E-07	0.00E+00	0.00E+00	5.75E-05	0.00E+00	0.00E+00	2.76E-03
762	ALL		390016	3779767	NonCancer	0.00E+00	9.94E-05	0.00E+00	9.60E-05	0.00E+00	9.60E-05	2.58E-03	0.00E+00	1.09E-06	0.00E+00	0.00E+00	5.14E-05	0.00E+00	0.00E+00	2.58E-03
197	ALL		390100	3779950	NonCancer	0.00E+00	2.35E-04	0.00E+00	2.30E-04	0.00E+00	2.30E-04	2.53E-03	0.00E+00	1.51E-06	0.00E+00	0.00E+00	6.76E-05	0.00E+00	0.00E+00	2.53E-03
757	ALL		390089	3779793	NonCancer	0.00E+00	1.12E-04	0.00E+00	1.08E-04	0.00E+00	1.08E-04	2.44E-03	0.00E+00	1.07E-06	0.00E+00	0.00E+00	5.09E-05	0.00E+00	0.00E+00	2.44E-03
249	ALL		390000	3780100	NonCancer	0.00E+00	1.55E-04	0.00E+00	1.51E-04	0.00E+00	1.51E-04	2.38E-03	0.00E+00	1.25E-06	0.00E+00	0.00E+00	5.53E-05	0.00E+00	0.00E+00	2.38E-03
229	ALL		389950	3780050	NonCancer	0.00E+00	1.31E-04	0.00E+00	1.28E-04	0.00E+00	1.28E-04	2.37E-03	0.00E+00	1.21E-06	0.00E+00	0.00E+00	5.23E-05	0.00E+00	0.00E+00	2.37E-03
214	ALL		390100	3780000	NonCancer	0.00E+00	2.36E-04	0.00E+00	2.32E-04	0.00E+00	2.32E-04	2.35E-03	0.00E+00	1.42E-06	0.00E+00	0.00E+00	6.51E-05	0.00E+00	0.00E+00	2.35E-03
250	ALL		390050	3780100	NonCancer	0.00E+00	1.89E-04	0.00E+00	1.85E-04	0.00E+00	1.85E-04	2.32E-03	0.00E+00	1.29E-06	0.00E+00	0.00E+00	5.86E-05	0.00E+00	0.00E+00	2.32E-03
182	ALL		390100	3779900	NonCancer	0.00E+00	1.91E-04	0.00E+00	1.87E-04	0.00E+00	1.87E-04	2.27E-03	0.00E+00	1.33E-06	0.00E+00	0.00E+00	5.83E-05	0.00E+00	0.00E+00	2.27E-03
729	ALL		390081.5	3779837	NonCancer	0.00E+00	1.23E-04	0.00E+00	1.20E-04	0.00E+00	1.20E-04	2.26E-03	0.00E+00	1.05E-06	0.00E+00	0.00E+00	4.97E-05	0.00E+00	0.00E+00	2.26E-03
763	ALL		390009	3779758	NonCancer	0.00E+00	8.94E-05	0.00E+00	8.64E-05	0.00E+00	8.64E-05	2.22E-03	0.00E+00	1.00E-06	0.00E+00	0.00E+00	4.48E-05	0.00E+00	0.00E+00	2.22E-03
143	ALL		390100	3779750	NonCancer	0.00E+00	1.05E-04	0.00E+00	1.02E-04	0.00E+00	1.02E-04	2.15E-03	0.00E+00	1.06E-06	0.00E+00	0.00E+00	4.57E-05	0.00E+00	0.00E+00	2.15E-03
719	ALL		389964	3779816	NonCancer	0.00E+00	8.69E-05	0.00E+00	8.41E-05	0.00E+00	8.41E-05	2.13E-03	0.00E+00	1.01E-06	0.00E+00	0.00E+00	4.31E-05	0.00E+00	0.00E+00	2.13E-03
193	ALL		389900	3779950	NonCancer	0.00E+00	1.01E-04	0.00E+00	9.85E-05	0.00E+00	9.85E-05	2.13E-03	0.00E+00	1.07E-06	0.00E+00	0.00E+00	4.48E-05	0.00E+00	0.00E+00	2.13E-03
178	ALL		389900	3779900	NonCancer	0.00E+00	9.04E-05	0.00E+00	8.75E-05	0.00E+00	8.75E-05	2.09E-03	0.00E+00	1.03E-06	0.00E+00	0.00E+00	4.30E-05	0.00E+00	0.00E+00	2.09E-03
756	ALL		390107	3779805	NonCancer	0.00E+00	9.89E-05	0.00E+00	9.60E-05	0.00E+00	9.60E-05	2.09E-03	0.00E+00	1.02E-06	0.00E+00	0.00E+00	4.40E-05	0.00E+00	0.00E+00	2.09E-03
764	ALL		390005	3779753	NonCancer	0.00E+00	8.46E-05	0.00E+00	8.18E-05	0.00E+00	8.18E-05	2.05E-03	0.00E+00	9.53E-07	0.00E+00	0.00E+00	4.17E-05	0.00E+00	0.00E+00	2.05E-03
232	ALL		390100	3780050	NonCancer	0.00E+00	2.14E-04	0.00E+00	2.10E-04	0.00E+00	2.10E-04	2.05E-03	0.00E+00	1.23E-06	0.00E+00	0.00E+00	5.77E-05	0.00E+00	0.00E+00	2.05E-03
248	ALL		389950	3780100	NonCancer	0.00E+00	1.20E-04	0.00E+00	1.17E-04	0.00E+00	1.17E-04	2.04E-03	0.00E+00	1.06E-06	0.00E+00	0.00E+00	4.59E-05	0.00E+00	0.00E+00	2.04E-03
268	ALL		390000	3780150	NonCancer	0.00E+00	1.41E-04	0.00E+00	1.37E-04	0.00E+00	1.37E-04	1.97E-03	0.00E+00	1.06E-06	0.00E+00	0.00E+00	4.74E-05	0.00E+00	0.00E+00	1.97E-03
210	ALL		389900	3780000	NonCancer	0.00E+00	1.04E-04	0.00E+00	1.01E-04	0.00E+00	1.01E-04	1.97E-03	0.00E+00	1.01E-06	0.00E+00	0.00E+00	4.27E-05	0.00E+00	0.00E+00	1.97E-03
730	ALL		390098	3779850	NonCancer	0.00E+00	1.27E-04	0.00E+00	1.24E-04	0.00E+00	1.24E-04	1.93E-03	0.00E+00	1.02E-06	0.00E+00	0.00E+00	4.50E-05	0.00E+00	0.00E+00	1.93E-03
141	ALL		390000	3779750	NonCancer	0.00E+00	8.05E-05	0.00E+00	7.79E-05	0.00E+00	7.79E-05	1.92E-03	0.00E+00	9.08E-07	0.00E+00	0.00E+00	3.92E-05	0.00E+00	0.00E+00	1.92E-03
269	ALL		390050	3780150	NonCancer	0.00E+00	1.62E-04	0.00E+00	1.59E-04	0.00E+00	1.59E-04	1.89E-03	0.00E+00	1.07E-06	0.00E+00	0.00E+00	4.89E-05	0.00E+00	0.00E+00	1.89E-03
755	ALL		390120	3779815	NonCancer	0.00E+00	7.79E-05	0.00E+00	7.55E-05	0.00E+00	7.55E-05	1.80E-03	0.00E+00	9.12E-07	0.00E+00	0.00E+00	3.69E-05	0.00E+00	0.00E+00	1.80E-03
228	ALL		389900	3780050	NonCancer	0.00E+00	1.01E-04	0.00E+00	9.81E-05	0.00E+00	9.81E-05	1.77E-03	0.00E+00	9.19E-07	0.00E+00	0.00E+00	3.94E-05	0.00E+00	0.00E+00	1.77E-03

ACUTE

*HARP - HRACalc v21081 5/4/2021 12:09:27 PM - Acute Risk - Input File: C:\Work\Bee\Glendale CA\Scholl Canyon 2021\HRA\Inner\SCHOLL CANYON INNER BORDER\hra\AcuteInnerHRAInput.hra

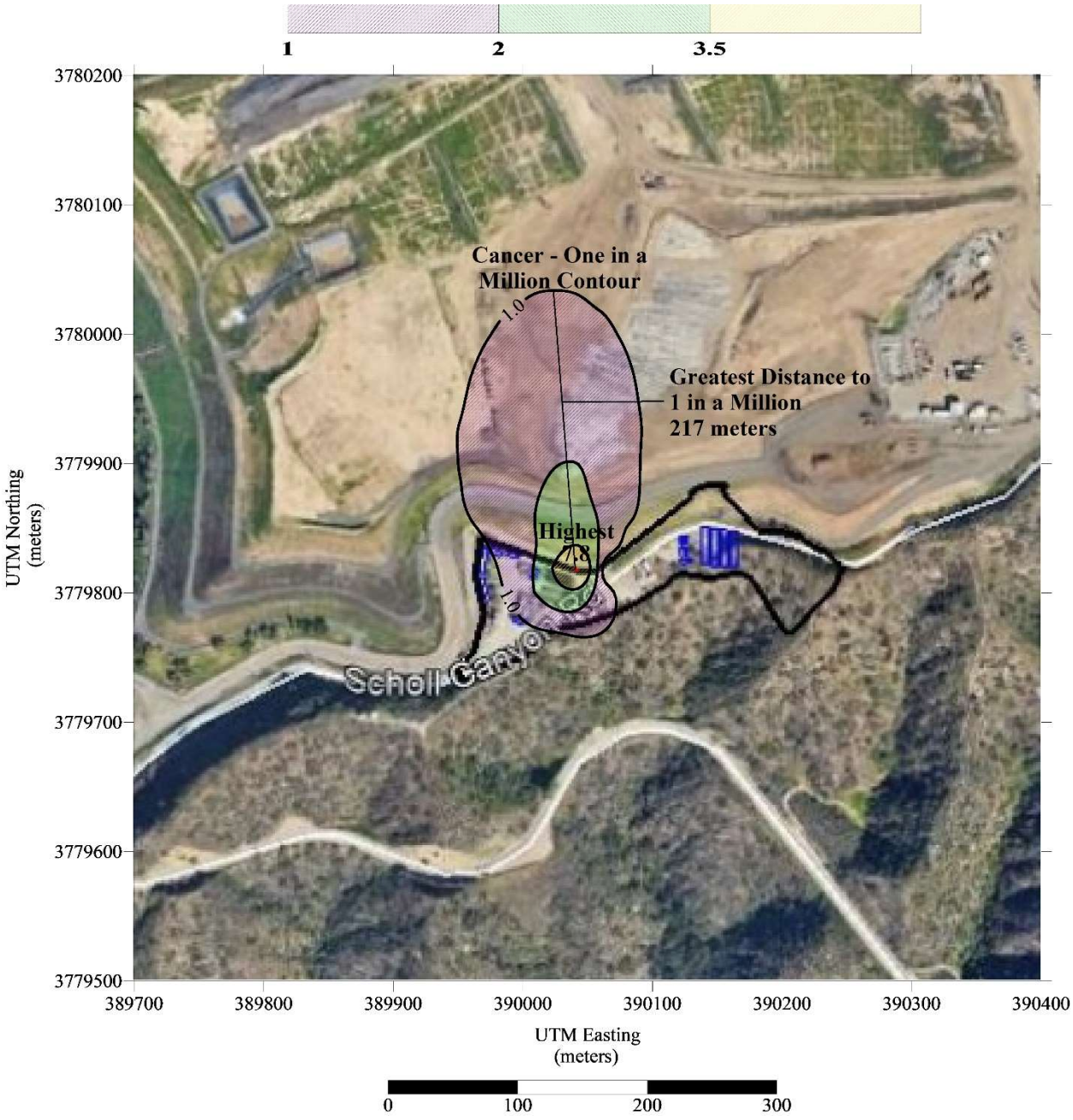
REC	GRP	NETID	X	Y	SCENARIO	CV	CNS	IMMUN	KIDNEY	GILV	REPRO/DE\	RESP	SKIN	EYE	BONE/TEET	ENDO	BLOOD	ODOR	GENERAL	MAXHI
725	ALL		390041	3779818	NonCancer	0.00E+00	1.81E-02	2.74E-03	0.00E+00	9.33E-07	5.60E-03	2.95E-02	0.00E+00	2.55E-01	0.00E+00	0.00E+00	2.74E-03	0.00E+00	0.00E+00	2.55E-01
726	ALL		390048	3779817	NonCancer	0.00E+00	1.23E-02	1.86E-03	0.00E+00	6.33E-07	3.86E-03	2.06E-02	0.00E+00	1.73E-01	0.00E+00	0.00E+00	1.86E-03	0.00E+00	0.00E+00	1.73E-01
724	ALL		390023	3779825	NonCancer	0.00E+00	1.09E-02	1.64E-03	0.00E+00	5.57E-07	3.41E-03	1.83E-02	0.00E+00	1.53E-01	0.00E+00	0.00E+00	1.64E-03	0.00E+00	0.00E+00	1.53E-01
760	ALL		390045	3779776	NonCancer	0.00E+00	9.02E-03	1.36E-03	0.00E+00	4.60E-07	2.84E-03	1.53E-02	0.00E+00	1.26E-01	0.00E+00	0.00E+00	1.36E-03	0.00E+00	0.00E+00	1.26E-01
759	ALL		390059	3779780	NonCancer	0.00E+00	8.14E-03	1.22E-03	0.00E+00	4.14E-07	2.57E-03	1.40E-02	0.00E+00	1.14E-01	0.00E+00	0.00E+00	1.22E-03	0.00E+00	0.00E+00	1.14E-01
727	ALL		390057	3779818	NonCancer	0.00E+00	7.60E-03	1.14E-03	0.00E+00	3.85E-07	2.41E-03	1.32E-02	0.00E+00	1.06E-01	0.00E+00	0.00E+00	1.14E-03	0.00E+00	0.00E+00	1.06E-01
723	ALL		390005	3779831	NonCancer	0.00E+00	6.47E-03	9.68E-04	0.00E+00	3.28E-07	2.06E-03	1.13E-02	0.00E+00	9.01E-02	0.00E+00	0.00E+00	9.68E-04	0.00E+00	0.00E+00	9.01E-02
761	ALL		390024	3779772	NonCancer	0.00E+00	5.20E-03	7.73E-04	0.00E+00	2.60E-07	1.68E-03	9.40E-03	0.00E+00	7.18E-02	0.00E+00	0.00E+00	7.73E-04	0.00E+00	0.00E+00	7.18E-02
762	ALL		390016	3779767	NonCancer	0.00E+00	4.88E-03	7.25E-04	0.00E+00	2.44E-07	1.58E-03	8.89E-03	0.00E+00	6.73E-02	0.00E+00	0.00E+00	7.25E-04	0.00E+00	0.00E+00	6.73E-02
728	ALL		390065	3779824	NonCancer	0.00E+00	4.65E-03	6.89E-04	0.00E+00	2.32E-07	1.51E-03	8.57E-03	0.00E+00	6.40E-02	0.00E+00	0.00E+00	6.89E-04	0.00E+00	0.00E+00	6.40E-02
758	ALL		390075	3779786	NonCancer	0.00E+00	4.18E-03	6.19E-04	0.00E+00	2.08E-07	1.36E-03	7.75E-03	0.00E+00	5.75E-02	0.00E+00	0.00E+00	6.19E-04	0.00E+00	0.00E+00	5.75E-02
142	ALL		390050	3779750	NonCancer	0.00E+00	4.16E-03	6.08E-04	0.00E+00	2.03E-07	1.38E-03	8.13E-03	0.00E+00	5.64E-02	0.00E+00	0.00E+00	6.08E-04	0.00E+00	0.00E+00	5.64E-02
763	ALL		390009	3779758	NonCancer	0.00E+00	3.95E-03	5.83E-04	0.00E+00	1.95E-07	1.29E-03	7.41E-03	0.00E+00	5.41E-02	0.00E+00	0.00E+00	5.83E-04	0.00E+00	0.00E+00	5.41E-02
722	ALL		389987	3779838	NonCancer	0.00E+00	3.84E-03	5.68E-04	0.00E+00	1.91E-07	1.26E-03	7.18E-03	0.00E+00	5.27E-02	0.00E+00	0.00E+00	5.68E-04	0.00E+00	0.00E+00	5.27E-02
168	ALL		390050	3779850	NonCancer	0.00E+00	3.81E-03	5.59E-04	0.00E+00	1.87E-07	1.26E-03	7.33E-03	0.00E+00	5.19E-02	0.00E+00	0.00E+00	5.59E-04	0.00E+00	0.00E+00	5.19E-02
167	ALL		390000	3779850	NonCancer	0.00E+00	3.79E-03	5.58E-04	0.00E+00	1.87E-07	1.25E-03	7.19E-03	0.00E+00	5.18E-02	0.00E+00	0.00E+00	5.58E-04	0.00E+00	0.00E+00	5.18E-02
757	ALL		390089	3779793	NonCancer	0.00E+00	3.62E-03	5.35E-04	0.00E+00	1.79E-07	1.19E-03	6.80E-03	0.00E+00	4.96E-02	0.00E+00	0.00E+00	5.35E-04	0.00E+00	0.00E+00	4.96E-02
764	ALL		390005	3779753	NonCancer	0.00E+00	3.52E-03	5.17E-04	0.00E+00	1.73E-07	1.16E-03	6.72E-03	0.00E+00	4.80E-02	0.00E+00	0.00E+00	5.17E-04	0.00E+00	0.00E+00	4.80E-02
141	ALL		390000	3779750	NonCancer	0.00E+00	3.21E-03	4.70E-04	0.00E+00	1.57E-07	1.06E-03	6.22E-03	0.00E+00	4.36E-02	0.00E+00	0.00E+00	4.70E-04	0.00E+00	0.00E+00	4.36E-02
756	ALL		390107	3779805	NonCancer	0.00E+00	3.05E-03	4.43E-04	0.00E+00	1.47E-07	1.03E-03	6.21E-03	0.00E+00	4.10E-02	0.00E+00	0.00E+00	4.43E-04	0.00E+00	0.00E+00	4.10E-02
729	ALL		390081.5	3779837	NonCancer	0.00E+00	2.91E-03	4.24E-04	0.00E+00	1.41E-07	9.81E-04	5.86E-03	0.00E+00	3.92E-02	0.00E+00	0.00E+00	4.24E-04	0.00E+00	0.00E+00	3.92E-02
720	ALL		389966.5	3779830	NonCancer	0.00E+00	2.85E-03	4.16E-04	0.00E+00	1.39E-07	9.48E-04	5.58E-03	0.00E+00	3.86E-02	0.00E+00	0.00E+00	4.16E-04	0.00E+00	0.00E+00	3.86E-02
755	ALL		390120	3779815	NonCancer	0.00E+00	2.87E-03	4.10E-04	0.00E+00	1.34E-07	1.00E-03	6.29E-03	0.00E+00	3.78E-02	0.00E+00	0.00E+00	4.10E-04	0.00E+00	0.00E+00	3.78E-02
721	ALL		389969	3779844	NonCancer	0.00E+00	2.74E-03	4.00E-04	0.00E+00	1.33E-07	9.12E-04	5.37E-03	0.00E+00	3.71E-02	0.00E+00	0.00E+00	4.00E-04	0.00E+00	0.00E+00	3.71E-02
730	ALL		390098	3779850	NonCancer	0.00E+00	2.75E-03	3.97E-04	0.00E+00	1.31E-07	9.40E-04	5.72E-03	0.00E+00	3.67E-02	0.00E+00	0.00E+00	3.97E-04	0.00E+00	0.00E+00	3.67E-02
143	ALL		390100	3779750	NonCancer	0.00E+00	2.76E-03	3.91E-04	0.00E+00	1.28E-07	9.72E-04	6.16E-03	0.00E+00	3.60E-02	0.00E+00	0.00E+00	3.91E-04	0.00E+00	0.00E+00	3.60E-02
765	ALL		389985	3779745	NonCancer	0.00E+00	2.55E-03	3.70E-04	0.00E+00	1.23E-07	8.59E-04	5.13E-03	0.00E+00	3.43E-02	0.00E+00	0.00E+00	3.70E-04	0.00E+00	0.00E+00	3.43E-02
719	ALL		389964	3779816	NonCancer	0.00E+00	2.49E-03	3.63E-04	0.00E+00	1.21E-07	8.38E-04	4.99E-03	0.00E+00	3.36E-02	0.00E+00	0.00E+00	3.63E-04	0.00E+00	0.00E+00	3.36E-02
716	ALL		389966.5	3779770	NonCancer	0.00E+00	2.49E-03	3.62E-04	0.00E+00	1.21E-07	8.36E-04	4.98E-03	0.00E+00	3.36E-02	0.00E+00	0.00E+00	3.62E-04	0.00E+00	0.00E+00	3.36E-02
731	ALL		390114.5	3779862	NonCancer	0.00E+00	2.42E-03	3.44E-04	0.00E+00	1.13E-07	8.50E-04	5.36E-03	0.00E+00	3.17E-02	0.00E+00	0.00E+00	3.44E-04	0.00E+00	0.00E+00	3.17E-02
717	ALL		389971	3779786	NonCancer	0.00E+00	2.31E-03	3.34E-04	0.00E+00	1.11E-07	7.83E-04	4.73E-03	0.00E+00	3.09E-02	0.00E+00	0.00E+00	3.34E-04	0.00E+00	0.00E+00	3.09E-02
715	ALL		389962	3779754	NonCancer	0.00E+00	2.19E-03	3.17E-04	0.00E+00	1.05E-07	7.44E-04	4.49E-03	0.00E+00	2.94E-02	0.00E+00	0.00E+00	3.17E-04	0.00E+00	0.00E+00	2.94E-02
754	ALL		390144	3779811	NonCancer	0.00E+00	2.23E-03	3.14E-04	0.00E+00	1.02E-07	7.96E-04	5.12E-03	0.00E+00	2.89E-02	0.00E+00	0.00E+00	3.14E-04	0.00E+00	0.00E+00	2.89E-02
766	ALL		389973	3779740	NonCancer	0.00E+00	2.14E-03	3.09E-04	0.00E+00	1.02E-07	7.32E-04	4.46E-03	0.00E+00	2.86E-02	0.00E+00	0.00E+00	3.09E-04	0.00E+00	0.00E+00	2.86E-02
180	ALL		390000	3779900	NonCancer	0.00E+00	2.19E-03	3.08E-04	0.00E+00	1.00E-07	7.79E-04	5.00E-03	0.00E+00	2.84E-02	0.00E+00	0.00E+00	3.08E-04	0.00E+00	0.00E+00	2.84E-02
166	ALL		389950	3779850	NonCancer	0.00E+00	2.06E-03	2.97E-04	0.00E+00	9.83E-08	7.01E-04	4.25E-03	0.00E+00	2.75E-02	0.00E+00	0.00E+00	2.97E-04	0.00E+00	0.00E+00	2.75E-02
125	ALL		390050	3779700	NonCancer	0.00E+00	2.04E-03	2.84E-04	0.00E+00	9.20E-08	7.37E-04	4.81E-03	0.00E+00	2.62E-02	0.00E+00	0.00E+00	2.84E-04	0.00E+00	0.00E+00	2.62E-02
732	ALL		390131	3779875	NonCancer	0.00E+00	1.99E-03	2.81E-04	0.00E+00	9.19E-08	7.02E-04	4.45E-03	0.00E+00	2.60E-02	0.00E+00	0.00E+00	2.81E-04	0.00E+00	0.00E+00	2.60E-02
156	ALL		390150	3779800	NonCancer	0.00E+00	2.02E-03	2.78E-04	0.00E+00	8.91E-08	7.46E-04	4.99E-03	0.00E+00	2.55E-02	0.00E+00	0.00E+00	2.78E-04	0.00E+00	0.00E+00	2.55E-02
140	ALL		389950	3779750	NonCancer	0.00E+00	1.91E-03	2.75E-04	0.00E+00	9.08E-08	6.54E-04	4.00E-03	0.00E+00	2.54E-02	0.00E+00	0.00E+00	2.75E-04	0.00E+00	0.00E+00	2.54E-02
733	ALL		390130	3779879	NonCancer	0.00E+00	1.90E-03	2.69E-04	0.00E+00	8.79E-08	6.75E-04	4.30E-03	0.00E+00	2.49E-02	0.00E+00	0.00E+00	2.69E-04	0.00E+00	0.00E+00	2.49E-02
753	ALL		390165	3779815	NonCancer	0.00E+00	1.92E-03	2.69E-04	0.00E+00	8.70E-08	6.95E-04	4.53E-03	0.00E+00	2.48E-02	0.00E+00	0.00E+00	2.69E-04	0.00E+00	0.00E+00	2.48E-02
767	ALL		389963	3779735	NonCancer	0.00E+00	1.84E-03	2.64E-04	0.00E+00	8.68E-08	6.39E-04	3.96E-03	0.00E+00	2.44E-02	0.00E+00	0.00E+00	2.64E-04	0.00E+00	0.00E+00	2.44E-02
714	ALL		389949	3779744	NonCancer	0.00E+00	1.80E-03	2.58E-04	0.00E+00	8.51E-08	6.22E-04	3.84E-03	0.00E+00	2.39E-02	0.00E+00	0.00E+00	2.58E-04	0.00E+00	0.00E+00	2.39E-02
124	ALL		390000	3779700	NonCancer	0.00E+00	1.84E-03	2.59E-04	0.00E+00	8.40E-08	6.59E-04	4.25E-03	0.00E+00	2.38E-02	0.00E+00	0.00E+00	2.59E-04	0.00E+00	0.00E+00	2.38E-02
718	ALL		389967.5	3779801	NonCancer	0.00E+00	1.78E-03	2.54E-04	0.00E+00	8.31E-08	6.23E-04	3.91E-03	0.00E+00	2.34E-02	0.00E+00	0.00E+00	2.54E-04	0.00E+00	0.00E+00	2.34E-02
752	ALL		390176	3779810	NonCancer	0.00E+00	1.85E-03	2.52E-04	0.00E+00	7.99E-08	7.03E-04	4.83E-03	0.00E+00	2.31E-02	0.00E+00	0.00E+00	2.52E-04	0.00E+00	0.00E+00	2.31E-02
126	ALL		390100	3779700	NonCancer	0.00E+00	1.84E-03	2.51E-04	0.00E+00	7.99E-08	6.96E-04	4.76E-03	0.00E+00	2.31E-02	0.00E+00	0.00E+00	2.51E-04	0.00E+00	0.00E+00	2.31E-02
736	ALL		390153	3779879	NonCancer	0.00E+00	1.73E-03	2.42E-04	0.00E+00	7.83E-08	6.26E-04	4.08E-03	0.00E+00	2.23E-02	0.00E+00	0.00E+00	2.42E-04	0.00E+00	0.00E+00	2.23E-02
734	ALL		390145	3779885	NonCancer	0.00E+00	1.71E-03	2.41E-04	0.00E+00	7.83E-08	6.12E-04	3.94E-03	0.00E+00	2.22E-02	0.00E+00	0.00E+00	2.41E-04	0.00E+00	0.00E+00	2.22E-02
713	ALL		389954	3779731	NonCancer	0.00E+00	1.68E-03	2.40E-04	0.00E+00	7.87E-08	5.88E-04	3.68E-03	0.00E+00	2.22E-02	0.00E+00	0.00E+00	2.40E-04	0.00E+00	0.00E+00	2.22E-02
768	ALL		389954	3779731	NonCancer	0.00E+00	1.68E-03	2.40E-04	0.00E+00	7.87E-08	5.88E-04	3.68E-03	0.00E+00	2.22E-02	0.00E+00	0.00E+00	2.40E-04	0.00E+00	0.00E+00	2.22E-02
735	ALL		390157	3779884	NonCancer	0.00E+00	1.68E-03	2.33E-04	0.00E+00	7.50E-08	6.12E-04	4.04E-03	0.00E+00	2.14E-02	0.00E+00	0.00E+00	2.33E-04	0.00E+00	0.00E+00	2.14E-02

POST LANDFILL CLOSURE

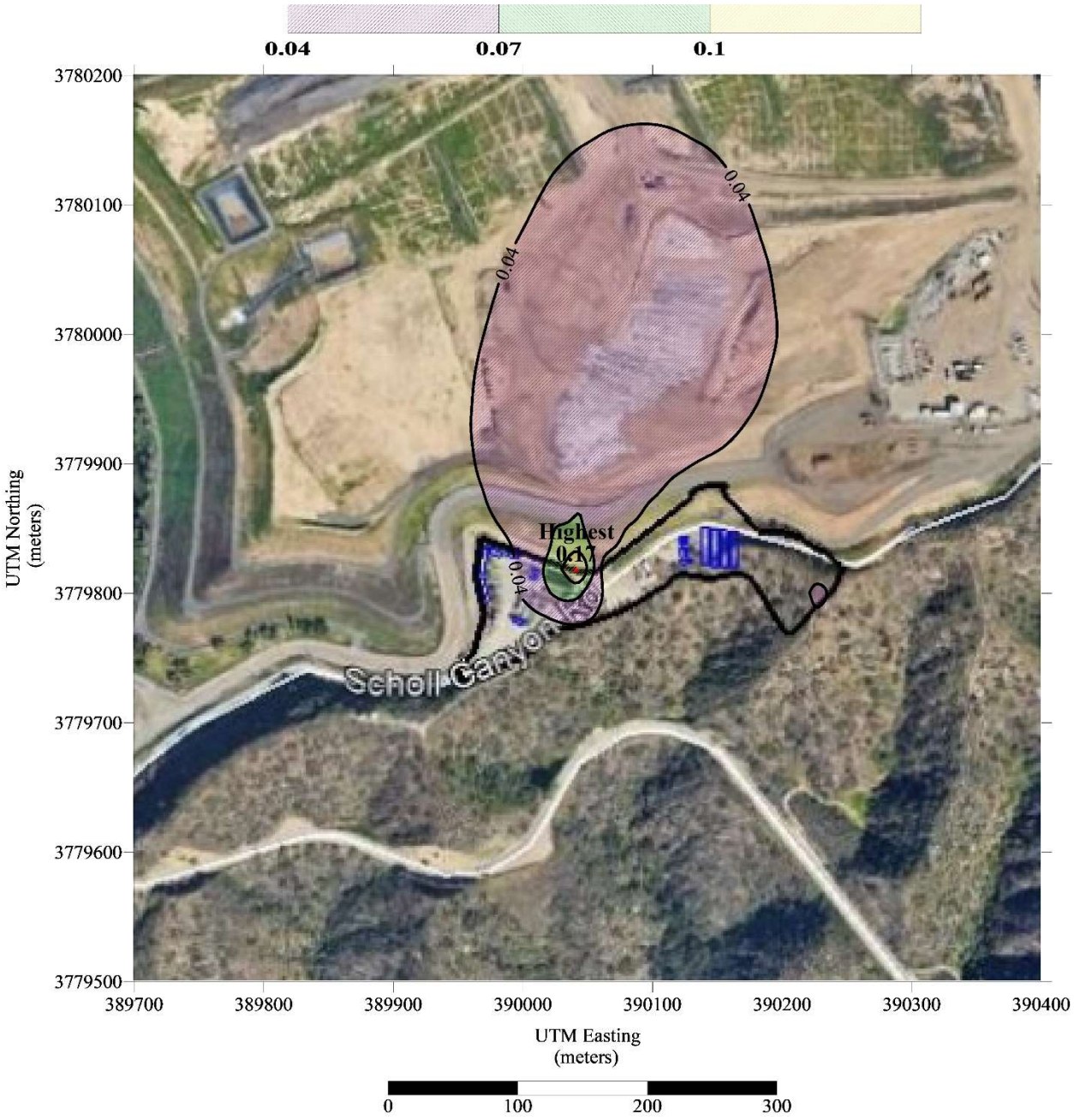
SITE MAPS SHOWING THE LOCATIONS OF MODELING RESULTS

CANCER RISK OUTPUT

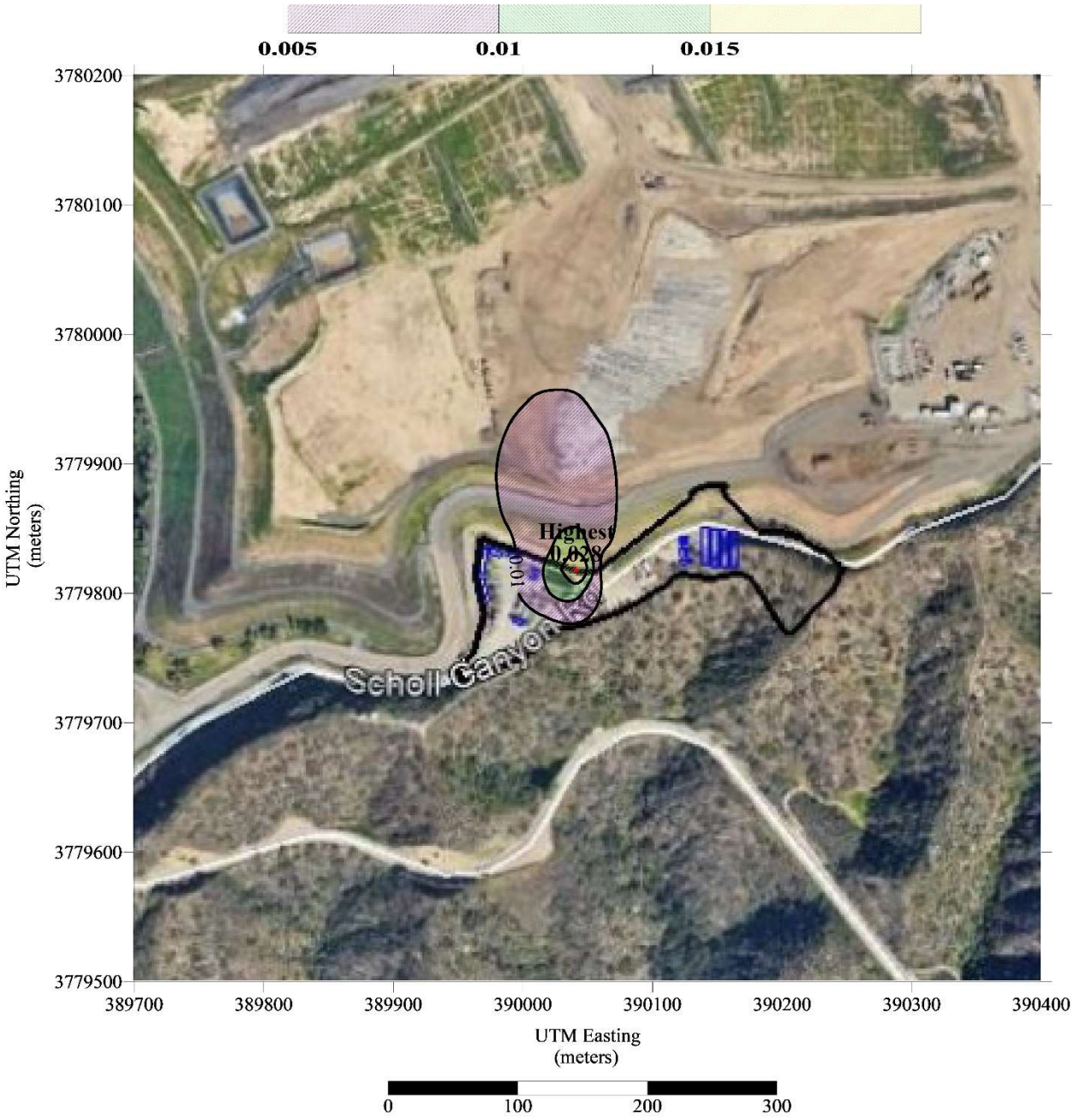
(UNIT OF MEASUREMENT: IN ONE MILLION)



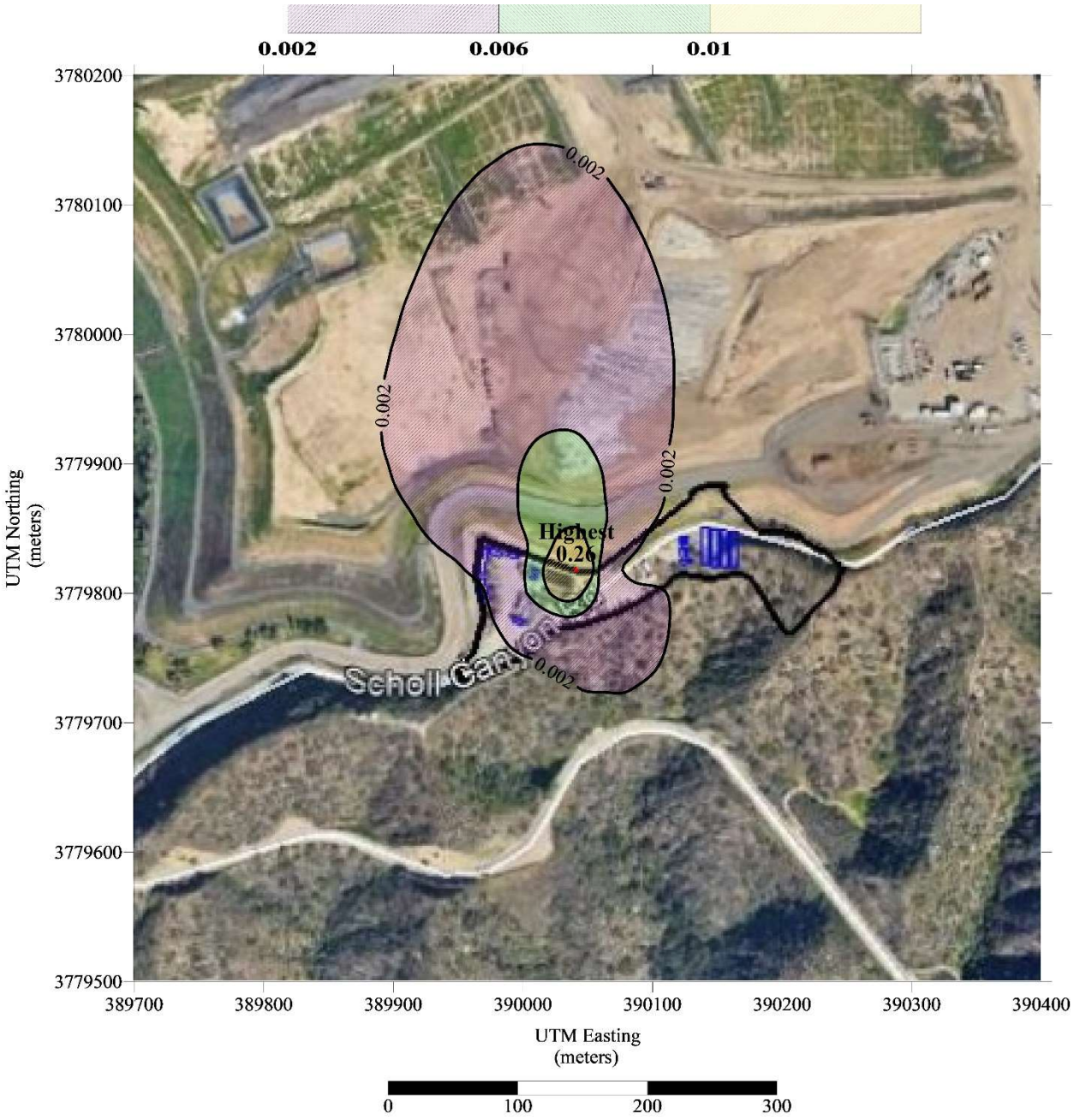
CHRONIC OUTPUT



CHRONIC 8-HOUR OUTPUT



ACUTE OUTPUT



Errata Attachment D: Updated Project GHG Emission Inventory

GREENHOUSE GASES EMISSION INVENTORY
BIOGAS RENEWABLE GENERATION PROJECT

Greenhouse Gases	GWP[1]	Landfill gas emission factor[2], kg/mmBtu	Natural gas emission factor[2], kg/mmBtu
CO_2	1	52.07	53.06
CH_4	25	0.0032	0.001
N_2O	298	0.00063	0.0001

NOTES:

[1]GWP = Global Warming Potential. [Source: IPCC, 4th Assessment Report, 2007]

[2]Source: USEPA website: http://www.epa.gov/climateleadership/documents/emission-factors.pdf for CH4 and N2O

GHG Emissions Project

Device/Activity	Max. Fuel consumption, MMBtu/hr	Annual Op. hours	CO_2, MT/year	CH_4, MT/year	N_2O, MT/year	Total CO_2e, MT/year
Facility	135.2592	8760	61696.21	3.791586	0.74646847	62,013
Construction[1]			256.7049	0.057	0	258
Facility Occupants[1]			48.9613	0.1245	1.29E-03	52
					Total Project GHG Emissions:	62,324

NOTES:

[1]GHG emissions are estimated by using CalEEmod.

Baseline GHG Emissions

Existing Equipment Type	LFG Flow, MMbtu/yr	CO_2, MT/year	CH_4, MT/year	N_2O, MT/year	CO_2e, MT/year
Flares	1184870.592	61,696	3.79	0.75	62,013

Errata Attachment E: Noise Monitoring Sheets

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon LA County
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10·21·15
Stantec Technician:	S. Roberts

Location and Description of Measurement (Receptor Location):

Receptor #1: 5471 Mount Helena Ave, LA, CA 90041
Home South of 134 Fwy. on Dead End Street

Approximate Distance from Receptor:

2,389' South of Project Site

Time Measurement Began:	1052 DAY		**Time Measurement Ended:**	1107	
Data Stored as Recorded #?:	1				
Leq:	54.0	dBA	**L90:**	51.5	dBA
MaxP:	89.0	dBC	**L75:**	—	dBA
MinL:	49.1	dBA	**L50:**	53.5	dBA
MaxL:	59.9	dBA	**L25:**	—	dBA
SEL:	83.7	dBA	**L10:**	55.5	dBA
LVN:	—	dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Sunny, Slight breeze, 79°F

Description/sources of ambient noise:

Freeway noise, birds,

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon LA
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10.21.15
Stantec Technician:	S Roberts / K Posekian

Location and Description of Measurement (Receptor Location):

Receptor 1: 5471 Mount Helena Ave, LA 90041
Home South of 134 fwy on Dead End St.

Approximate Distance from Receptor:

2,389' South of Project Site

Time Measurement Began:	22.22 NITE		**Time Measurement Ended:**	2237	
Data Stored as Recorded #?:	7				
Leq:	56.8	dBA	**L90:**	52.5	dBA
MaxP:	92.2	dBC	**L75:**	—	dBA
MinL:	50.5	dBA	**L50:**	55.0	dBA
MaxL:	73.5	dBA	**L25:**	—	dBA
SEL:	86.6	dBA	**L10:**	58.0	dBA
LVN:	—	dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Clear 66°F

Description/sources of ambient noise:

Freeway, local traffic, crickets, stream

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon — LA County
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10.21.15
Stantec Technician:	S. Roberts

Location and Description of Measurement (Receptor Location):

Receptor #2: 1233 Cedaredge Ave, LA, CA 90041. Home on the corner of Cedaedge Ave and Blue Hill just South of the 134 fwy

Approximate Distance from Receptor:

3,033' South of project site

Time Measurement Began:	1114 DAY		**Time Measurement Ended:**	1129	
Data Stored as Recorded #?:	2				
Leq:	65.2	dBA	**L90:**	62.0	dBA
MaxP:	94.1	dBC	**L75:**	—	dBA
MinL:	60.1	dBA	**L50:**	64.5	dBA
MaxL:	75.0	dBA	**L25:**	—	dBA
SEL:	94.9	dBA	**L10:**	67.0	dBA
LVN:	—	dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Sunny, Slight breeze 79°F

Description/sources of ambient noise:

Freeway noise,

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon LA COUNTY
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10·21·15
Stantec Technician:	S. Roberts / K. Posekian

Location and Description of Measurement (Receptor Location):

Receptor #2: 1233 Cedaredge Ave, LA, CA. 90041. Home on the corner of Cedaredge Ave & Blue Hill
Just South of the 134 Fwy.

Approximate Distance from Receptor:

3,033' South of Project Site.

Time Measurement Began:	2243 NITE		**Time Measurement Ended:**	2258	
Data Stored as Recorded #?:	8				
Leq:	64.3	dBA	**L90:**	61.5	dBA
MaxP:	92.5	dBC	**L75:**		dBA
MinL:	59.3	dBA	**L50:**	64.0	dBA
MaxL:	69.0	dBA	**L25:**		dBA
SEL:	94.1	dBA	**L10:**	66.0	dBA
LVN:		dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Clear; 66°F

Description/sources of ambient noise:

Local Traffic, Freeway Noise; Crickets

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon Pasadena
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10-21-15
Stantec Technician:	S. Roberts

Location and Description of Measurement (Receptor Location):

Receptor 3: corner of Patircan & LaMirada

Approximate Distance from Receptor:

2,970 North East of Project Site

Time Measurement Began:	1145 DAY		**Time Measurement Ended:**	1202	
Data Stored as Recorded #?:	3				
Leq:	54.5	dBA	**L90:**	44.0	dBA
MaxP:	93.4	dBC	**L75:**	—	dBA
MinL:	41.5	dBA	**L50:**	48.5	dBA
MaxL:	67.1	dBA	**L25:**	—	dBA
SEL:	84.2	dBA	**L10:**	59.0	dBA
LVN:		dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Sunny, Slight Breeze 78°F

Description/sources of ambient noise:

Freeway, local traffic, trucks hauling in & out of land fill const. noise, i.e. hand tools, grinder, hammer, etc. (building house)

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon Pasadena
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10·21·15
Stantec Technician:	S. Roberts / K. Poskian

Location and Description of Measurement (Receptor Location):

Receptor 3: Corner of Patizan & La Mirada

Approximate Distance from Receptor:

2,970 North east of ~~Property~~ project site.

Time Measurement Began:	2315 NITE	**Time Measurement Ended:**	2330		
Data Stored as Recorded #?:	9				
Leq:	47.8	dBA	**L90:**	43.0	dBA
MaxP:	85.8	dBC	**L75:**	—	dBA
MinL:	41.9	dBA	**L50:**	44.0	dBA
MaxL:	64.6	dBA	**L25:**	—	dBA
SEL:	77.5	dBA	**L10:**	45.5	dBA
LVN:		dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Clear; 66°F

Description/sources of ambient noise:

Freeway Traffic; Local Traffic; Crickets; Water Fountain; Helicopter.

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon Pasadena
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10.21.15
Stantec Technician:	S. Roberts

Location and Description of Measurement (Receptor Location):

Receptor 4: 1600 Glen Oaks Blvd, Pasadena, CA 91105

Approximate Distance from Receptor:

2,607' Northeast of Project Site

Time Measurement Began:	1219 DAY		**Time Measurement Ended:**	1234	
Data Stored as Recorded #?:	4				
Leq:	37.1	dBA	**L90:**	34.0	dBA
MaxP:	86.0	dBC	**L75:**	—	dBA
MinL:	32.8	dBA	**L50:**	36.0	dBA
MaxL:	47.0	dBA	**L25:**	—	dBA
SEL:	66.6	dBA	**L10:**	39.0	dBA
LVN:	—	dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Sunny, Slight Breeze 81°F

Description/sources of ambient noise:

Freeway in the distance, birds, frogs

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon Pasadena
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10.21.15
Stantec Technician:	S. Roberts / K. Posekian

Location and Description of Measurement (Receptor Location):

Receptor 4: 1600 Glen Oaks Blvd, Pasadena, CA. 91105

Approximate Distance from Receptor:

2,687' Northeast of Project Site.

Time Measurement Began:	2342 NITE		**Time Measurement Ended:**	2357	
Data Stored as Recorded #?:	10				
Leq:	47.1	dBA	**L90:**	37.0	dBA
MaxP:	94.6	dBC	**L75:**		dBA
MinL:	36.3	dBA	**L50:**	38.5	dBA
MaxL:	67.2	dBA	**L25:**		dBA
SEL:	76.9	dBA	**L10:**	40.8	dBA
LVN:		dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Clear; 66°F;

Description/sources of ambient noise:

Freeway Traffic; Local Traffic; Crickets

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon Glendale
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10.21.15
Stantec Technician:	S. Roberts

Location and Description of Measurement (Receptor Location):

Receptor 5: corner of Figueroa & Marengo Dr., Glendale @ Deadend

Approximate Distance from Receptor:

4,271' North of project site

Time Measurement Began:	13.15 DAY		**Time Measurement Ended:**	1330	
Data Stored as Recorded #?:	5				
Leq:	43.4	dBA	**L90:**	30.5	dBA
MaxP:	86.2	dBC	**L75:**	—	dBA
MinL:	29.1	dBA	**L50:**	34.0	dBA
MaxL:	62.8	dBA	**L25:**	—	dBA
SEL:	73.1	dBA	**L10:**	45.0	dBA
LVN:		dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Sunny, Slight breeze 81°F

Description/sources of ambient noise:

Quiet neighborhood, helo circling the area. Local traffic

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon Glendale
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10.22.15
Stantec Technician:	S. Roberts / K. PoseKian

Location and Description of Measurement (Receptor Location):

Receptor 5: Corner of Figueroa & Marengo Dr., Glendale, CA. @ Deadend

Approximate Distance from Receptor:

4,271' North of Project site.

Time Measurement Began:	2420	NITE	**Time Measurement Ended:**	2435	
Data Stored as Recorded #?:	11				
Leq:	39.1	dBA	**L90:**	36.5	dBA
MaxP:	68.1	dBC	**L75:**		dBA
MinL:	35.1	dBA	**L50:**	38.5	dBA
MaxL:	46.4	dBA	**L25:**		dBA
SEL:	68.9	dBA	**L10:**	40.5	dBA
LVN:		dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Clear; 66°F

Description/sources of ambient noise:

Local Traffic; Crickets; Train.

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon Glendale
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10.21.15
Stantec Technician:	S. Roberts

Location and Description of Measurement (Receptor Location):

Receptor 6: 2840 Glencoaks Canyon Rd, Glendale 91206 next to Park and down hill from Scholl cyn Golf + tennis club and athetic fields.

Approximate Distance from Receptor:

2,281' West of the Project Site

Time Measurement Began:	1417 DAY		**Time Measurement Ended:**	1432	
Data Stored as Recorded #?:	6				
Leq:	46.4	dBA	**L90:**	37.5	dBA
MaxP:	85.4	dBC	**L75:**	—	dBA
MinL:	35.4	dBA	**L50:**	42.5	dBA
MaxL:	63.6	dBA	**L25:**	—	dBA
SEL:	76.0	dBA	**L10:**	48.5	dBA
LVN:	—	dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Sunny. Slight Breeze, 82°F

Description/sources of ambient noise:

birds, heavy trucks/equipment in distance

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon Glendale
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10.22.15
Stantec Technician:	S. Roberts / K. Poseklan

Location and Description of Measurement (Receptor Location):

Receptor 6: 2840 Glenoaks Canyon Rd; Glendale 91206. Next to Park & Downhill from Scholl Gyn Golf and Tennis Club and athletic fields

Approximate Distance from Receptor:

2,281' West of Project Site.

Time Measurement Began:	2453 NITE		**Time Measurement Ended:**	0108	
Data Stored as Recorded #?:	12				
Leq:	46.5	dBA	**L90:**	44.5	dBA
MaxP:	75.0	dBC	**L75:**	—	dBA
MinL:	43.5	dBA	**L50:**	45.5	dBA
MaxL:	53.5	dBA	**L25:**	—	dBA
SEL:	76.1	dBA	**L10:**	47.5	dBA
LVN:	—	dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Clear

Description/sources of ambient noise:

Crickets; Dog Barking;

Errata Attachment F: Comment Letters on Draft EIR

L1

From: Bret Marnell
To: Krause, Erik
Subject: New Scholl Powerplant
Date: Thursday, July 09, 2020 12:41:20 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

I think it is interesting that in your recent email about the EIR for the proposed power plant on the existing Scholl Canyon landfill, you never mention Scholl Canyon.

L1-1 It's almost as if you want to ignore all the people who actually live in the surrounding area.

But people do live here, in the canyons to the east, south, and west of the proposed site.

L1-2 And we don't want a biogas power plant built in our backyards.

L1-3 Use the methane and the existing gas pipeline to power Greyson.

L1-4 Use the land atop the landfill for a solar panel array if you want to generate more power there.

L1-5 But we say no to burning gas here in Scholl. There are simply too many families, kids, and homes in a high fire risk area.

We say no to this irresponsible plan.

Thank you,

Bret Marnell
Samantha Marnell
Bee Marnell

Concerned Glendale residents

L2

From: Carolyn Howard-Johnson
To: Krause, Erik
Subject: Great direction
Date: Thursday, July 09, 2020 12:21:46 PM

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L2-1 Thank you for pursuing this project. It seems to me we have been talking about it for a long time. Good luck. Great for the environment. Forward looking.

Carolyn Howard-Johnson
Author of the multi award-winning HowToDoItFrugally Series of books for writers including
The Frugal Editor: Do-it-yourself editing secrets for authors
Website: https://www.howtodoitfrugally.com
Amazon Profile - bit.ly/CarolynsAmznProfile
Twitter - @FrugalBookPromo
Celebrating: bit.ly/NonfictionAuthorAssocFeaturedAuthor

L3

From: Daniel Petroff
To: Krause, Erik
Subject: Proposed 12-megawatt generation facility
Date: Thursday, July 09, 2020 4:18:36 PM

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L3-1

Mr. Krause
I was wondering if the city considered gas turbines for the new generation plant. It would seem to me that if you are burning flares the use of gas turbines would not change the emissions greatly and you would be generating electricity. Also, would there be a need to remove the liquid from the gas.
Dan Petroff

L4

From: Jake K
To: Krause, Erik
Subject: Fwd: GWP Proposed BioGas Renewable Generation Project Draft Environmental Impact Report Now Available
Date: Thursday, July 09, 2020 9:07:21 AM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Good morning,

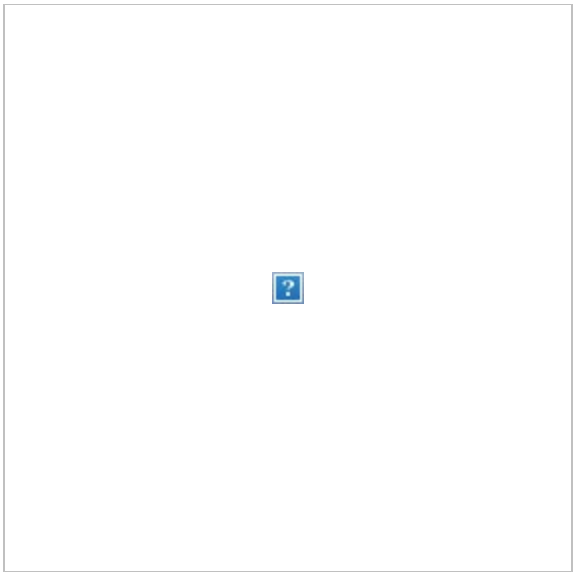
This project is deeply concerning. Our beautiful Canyon is home to families who do not want this infrastructure added to our neighborhood.

L4-1 We have no faith in the results of this report. Of course this is not a safe thing to live near.

Do the right thing. Find somewhere else for it. It will ruin our canyon and completely change this neighborhood forever.

Jake

---------- Forwarded message ---------
From: **Glendale Water & Power** <Glendalewaterpower@glendaleca.gov>
Date: Thu, Jul 9, 2020 at 8:22 AM
Subject: GWP Proposed BioGas Renewable Generation Project Draft Environmental Impact Report Now Available
To: <jkatz101@gmail.com>



Proposed BioGas Renewable Generation Project Draft Environmental Impact Report Now Available

Dear Glendale Water & Power Residents,

Glendale Water & Power is proposing a project that includes construction and operation of an approximately 12-megawatt power generation facility that would utilize landfill gas as fuel to generate renewable energy. The proposed approximately 2.2-acre power plant would be located on a portion of an approximately 95-acre site owned by Los Angeles County within the City of Glendale's land use and zoning jurisdiction. The proposed project would beneficially use the landfill gas and would provide environmental and economic benefits regardless of ultimate capacity of the landfill. The proposed project would include the plant facility, natural gas pipeline, water pipeline and two water tanks.

The Draft Environmental Impact Report (Draft EIR) has been prepared pursuant to the requirements of the State Guidelines for the implementation of the California Environmental Quality Act (CEQA). Pursuant to the findings of the Initial Study, the Draft EIR examines impacts to Aesthetics, Air Quality, Biological Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire. The Draft EIR found that there would be less than significant impacts to Aesthetics, Air Quality, Energy, Geology and Soils, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Noise, Transportation and Traffic, Tribal Cultural Resources, and Utilities and Service Systems. Impacts to Biological Resources, Hazards and Hazardous Materials, and Wildfire would be less than significant with mitigation incorporated. The Project would not result in any significant and unavoidable environmental impacts. The Draft EIR will be available for public review for a period of 90 days on and after July 2, 2020, on the City's Project website at: http://glendalebiogasgeneration.com/#draft-eir

If you would like to make a comment, please provide written comments to Erik Krause, Deputy Director of Community Development, City of Glendale, Community Development Department, 633 East Broadway, Room 103, Glendale, California 91026-4386; fax (818) 240-0392 or email ekrause@glendaleca.gov. **Comments must be received prior to the close of the 90-day public review period at 5:00 p.m. on September 30, 2020.**

WWW.GLENDALEWATERANDPOWER.COM

Unsubscribe

This message was sent to **jkatz101@gmail.com** from **Glendalewaterpower@glendaleca.gov**

Glendale Water & Power
City of Glendale
141 N Glendale Av
Glendale, CA 91206



L5

From: Ken Grayson
To: Krause, Erik
Subject: Proposed Bio Gas Renewal
Date: Thursday, July 09, 2020 8:44:05 AM

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L5-1 Dear Sir: What is the cost of the project? What is the payback period? How will it be funded? Ken Grayson/ Grayson's Tune Town

Sent from Mail for Windows 10

L6

From: rome balina
To: Krause, Erik
Subject: Proposed BioGas Renewable Generation Project Draft Environmental Impact Report Now Available
Date: Thursday, July 09, 2020 1:54:49 PM

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Hi,

L6-1 Will this project increase my monthly rate?

Regards
Romeo

L7

From: Roberto Melendez
To: Krause, Erik
Subject: BioGas Renewable Generation Project
Date: Friday, July 31, 2020 10:14:14 AM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Mr Erik Krause,

L7-1 I wish my email find you well, I appreciate and take the opportunity given to offer my opinion in regards the biogas renewable energy plant in Glendale.
There are options of better value and equivalent cost in regards to the benefit they provide.
A solar energized city, powered by generators of large capacity with storage in
proper batteries for the excess, plus the possibility to sale part of the excess to our neighbors in Pasadena, Burbank, Eagle Rock etc.
Is a better concept to provide energy to Glendale.
It would place Glendale on the top leading Cities in America and will benefit its neighborhood tremendously.
Why not going that way.
There are solar generators in Ca of large capacity already working in place.
Please check:
Topaz Solar providing energy to 180,000 households in San Luis Obispo County, California.
Desert Sunlight Solar Farm providing energy to 160,000 households in Mojave desert Riverside County, California.
Glendale can be the first in many fields this is one of them.

Best

Roberto Melendez

Sent from Yahoo Mail for iPhon

L8

From: Bill Markis
To: Krause, Erik
Cc: Council District 14; Eagle Rock Neighborhood Council; boulevardsentinel@gmail.com
Subject: Scholl Canyon
Date: Saturday, August 01, 2020 5:35:32 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Erik Krause, Director of Community Development, City of Glendale, Community Development Department, 633 E. Broadway, Suite 103, Glendale, CA 91206-4311; fax (818) 240-0392

Dear Erik Krause,

The landfill is harming Eagle Rock and Glendale neighbors in so many ways:

- The smell of decomposed trash and methane gases
- The burning of methane gases
- The increased traffic of people dumping trash

L8-1

This is awful.

Please close it!

Have a great weekend,

Bill Markis
5174 Loleta Ave.
Los Angeles, CA 90041
(951) 741-1402
Connect with me on LinkedIn

L9

From: Nancy J. Wall
To: Krause, Erik
Subject: Biogas Plant
Date: Wednesday, August 05, 2020 12:10:56 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

My husband and I have lived in Eagle Rock for 23 years. We live on a hill that has a view of the Schol Canyon Dump.

L9-1 We have EXTREME concerns for our health as related to the proposed biogas plant. We are in a high risk group in terms of our health.
How could you build this plant knowing it will impact people around it?
Are you that callous?

Nancy & Dan
Eagle Rock

L10

From: Fred Wallingford
To: Krause, Erik
Subject: Scholl Canyon Biogas Project
Date: Sunday, August 09, 2020 7:54:25 AM

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Mr. Krause,

L10-1 I am a longtime resident fo Eagle Rock and I write concerning the proposed Biogas Plant. The DEIR indicates worsening air quality at Scholl Canyon if GWP builds it. Interestingly, the

L10-2 DEIR fails to mention that GWP could use the methane at Scholl Canyon without harming Eagle Rock, i.e., the pipeline from Scholl Canyon to the Grayson power plant in Glendale, where it can be processed there.

L10-3 Please consider these concerns when GWP makes its decision. Thank you.

Fred Wallingford

L11

From: Jay Duplass
To: Krause, Erik
Cc: Jen Tracy Duplass
Subject: Biogas project scholl Canyon
Date: Monday, August 10, 2020 1:48:46 PM

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L11-1

Dear Mr. Krause,
Our family (we have 2 kids and a dog) live just below Scholl Canyon in Eagle rock, and we have grave concerns about the negative side effects of the Biogas project for the health of our family and community.
Thank you for listening,
Jay Jen Mimi Sam and Ozzie Duplass

L12

From: Kit Cole
To: Krause, Erik
Subject: Biogas facility
Date: Wednesday, August 12, 2020 2:09:38 PM

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Hi, Erik

L12-1 Hope you're doing well and you're safe and healthy.
Just wanted to let you know I'm fully in support of the biogas facility.
Please contact me if there's anything I can do to help.
I used to work at Waste Management and we used biogas for all kinds of energy generation.

Kit Cole
Kit Cole Consulting
818-822-6378 (I will respond more quickly if you text me at this number)
kit@kitcoleconsulting.com

www.iap2usa.org
"Pursuing the greater good: good decisions made together."

L13

From:	Ken Salter
To:	Krause, Erik; Agajanian, Vrej; Devine, Paula; Kassakhian, Ardashes; Brotman, Daniel; Najarian, Ara
Subject:	Environmental Impact Report for the Scholl Canyon Power Plant - Comments
Date:	Tuesday, August 18, 2020 11:29:14 PM

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Dear Mr. Krause,

L13-1 As a homeowner in Glenoaks Canyon since 1994 I am very concerned about the findings in the EIR for the Scholl Canyon power plant. In addition to a number of potential hazards there

L13-2 is 100% certainty of negative impacts on the health of citizens in the area due to the dramatic and concentrated increase in emissions. As an engineer, I calculated the equivalent emissions

L13-3 from a 12 Mw power plant in terms of something I could picture. 12 Mw of power is equivalent to about 200 cars traveling at highway speeds in terms of power. So this is like adding 4 lanes of freeway traffic across the 1 mile site. Picture that: four lanes of busy freeway stretched out over the landfill. That is what this project brings to our neighborhood.

L13-4 Can you in good conscious support such an adverse risk to our health?

Ken Salter

L14

From: Mona Valeriano
To: Krause, Erik
Subject: EIR Proposal
Date: Wednesday, August 19, 2020 3:01:10 PM

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Hi Erik Krause,

L14-1 Thank you in advance for reading my comments regarding the EIR Biogas Project proposal. I'm new to Glenoaks Canyon and my husband and I nearly backed out of our escrow when we learned about the proposal. One of the reasons we fell in love with our home in Glenoaks was because the community is so peaceful and pleasant, but we had serious concerns about not only the landfill in its current form (since it isn't up to EPA standards), but then to learn the City of Glendale is planning a Biogas Power Plant in the same location, the combination of the fire risk, earthquake risk, high pollution levels that would come, and the potential noise to the community - we had to give serious thought on whether we wanted to go through with our escrow. We did decide to do so because it felt hopeful to fight it rather than choose to go elsewhere based on a future possibility.

L14-2 But after having done a lot of research, here are my primary concerns:
- the current landfill is not up to EPA standards - it is in a high fire and earthquake zone and is in too close proximity to neighborhoods. That's bad in and of itself but I understand cities need landfills. But - to then further industrialize the area feels extremely unsafe and unethical when the earthquake and fire conditions are what they are...and there's only one way out of Glenoaks Canyon. The implications of this are ultimately terrifying for me on a worst case scenario basis

L14-3 - the landfill also doesn't have a lining under it, so how will the water also be protected from possible contamination? - this worries me as well.

L14-4 - I have a 1 year old son and finally, our house has a yard. I really don't want to keep him indoors for years to come on account of the air pollution that the power plant will cause. - I hear the pollution levels will exceed safe standards and there seem to be no plans in the proposal to mitigate this

L14-5 - I understand methane will be released for years to come and some plan of action needs to be in effect to convert this into renewable energy - but I ask that the City of Glendale looks into alternatives, specifically in updating the Grayson plant (renovating the pipeline) - or to identify another safe option altogether

L14-6 - I also understand the landfill will be at capacity in 8-10 years and was planned to be closed. I support this and do not believe the area should be further industrialized.

L14-7 - Also, since flaring is currently being used to remove the excess methane, I encourage the City of Glendale to use new flares to improve air quality levels.

Thanks for reading,
Mona

--
Mona Saba Valeriano, LCSW
4620 Hollywood Blvd
Los Angeles CA 90027
(323) 942-9520
www.monaelyouseftherapy.com

NOTICE OF CONFIDENTIALITY
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L15

From: Wm Johnson
To: Krause, Erik
Subject: Power to the People
Date: Wednesday, August 19, 2020 12:07:00 PM

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L15-1 We are not going stop using our ac, the city should plan for all these huge new buildings like condos and townhouses, why are they so important and we have lived here for over forty years? Volume usually gets a better deal and home owners should be able to right our utilities off, our homes are a business. WJ
Sent from my iPad

L16

From: elisa p. foster
To: Krause, Erik
Subject: Stop the Biogas Power Plant
Date: Saturday, August 22, 2020 3:03:58 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Erik Krause,

L16-1 I live and work in Northeast Los Angeles and I am very concerned about GWP's plans to build a biogas power plant in Scholl Canyon, which will cause pollution in Eagle Rock. Alternative solutions have not been thoroughly explored or presented in the DEIR. I strongly urge you to seriously consider alternative plans that are not harmful to the people of Eagle Rock.

L16-2

Thank you for your time.

Elisa Foster

L17

From: Stephanie C.
To: Krause, Erik
Subject: Public comment on the Grayson / Scholl Canyon DEIR
Date: Saturday, August 22, 2020 2:54:27 PM

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Hi,

L17-1 As a homeowner in Glendale I still can't believe we are on the path to repower California's last gas power plant. I refuse to accept that our city can't make good on its promise to achieve clean energy goals.

All cities in California are required to rely on 100% clean energy sources by 2045, under state law. So why are we wasting resources to try to retrofit a dirty fossil fuel plant? The city is relying on GWP to police itself, and their Scholl Canyon DEIR is not an objective or

L17-2 transparent document. Where are the comparisons / bids by the city to find clean energy alternatives?

Sincerely,
Stephanie Chan

L18

COUNTY OF LOS ANGELES
FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2426
www.fire.lacounty.gov

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MARK RIDLEY-THOMAS
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KATHRYN BARGER
FIFTH DISTRICT

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

August 25, 2020

Erik Krause, Deputy Director
City of Glendale
Community Development Department
633 East Broadway
Glendale, CA 91206

Dear Mr. Krause:

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT, "BIOGAS RENEWABLE GENERATION PROJECT," INCLUDES THE CONSTRUCTION AND OPERATION OF AN APPROXIMATELY 12-MEGAWATT POWER GENERATION FACILITY THAT WOULD UTILIZE LANDFILL GAS AS FUEL TO GENERATE RENEWABLE ENERGY, LOCATED AT 3001 SCHOLL CANYON ROAD, GLENDALE, FFER 2020005148

The Notice of Availability of a Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

L18-1 The subject property is entirely within the City of Glendale, which is not a part of the emergency response area of the Los Angeles County Fire Department (also known as the Consolidated Fire Protection District of Los Angeles County). Therefore, this project does not appear to have any impact on the emergency responsibilities of this Department.

For any questions regarding this response, please contact Loretta Bagwell, Planning Analyst, at (323) 881-2404 or Loretta.Bagwell@fire.lacounty.gov.

LAND DEVELOPMENT UNIT:

This project is located entirely in the City of Glendale. Therefore, the City of Glendale's Fire Department has the jurisdiction concerning this project and will be setting conditions.

L18-2 This project is in close proximity to the jurisdictional area of Los Angeles County Fire Department. However, this project is unlikely to have an impact that necessitates a comment concerning general requirements from the Land Development Unit of the Los Angeles County Fire Department.

For any questions regarding the report, please contact FPEA Claudia Soiza at (323) 890-4243 or Claudia.soiza@fire.lacounty.gov.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

L18-3 Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Joseph Brunet at (818) 890-5719.

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department has no jurisdiction in the City of Glendale. HHMD has no further comments at this time.

L18-4 Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

RONALD M. DURBIN, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

RMD:ac

L19

From: joe valeriano
To: Krause, Erik
Subject: Scholl Bio-Gas Power
Date: Saturday, August 29, 2020 11:57:56 AM

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Mr. Krause,

L19-1 I am writing to express my opposition to the expansion of the Scholl landfill into a bio-gas power plant. My wife and I recently purchased a home in Glen Oaks Canyon. The proposal for the plant almost caused us to pull out of escrow. However, the neighborhood convinced us otherwise. My concern is a power plant in such close proximity will not only ruin Glen Oaks, but the all the other surrounding areas. A landfill in the middle of and an area as populated as the communities surrounds Scholl is nuts-and contrary to EPA regulations-as it is, but to further exacerbate the situation with a power plant makes no sense.

L20

From: Susan Hunt
To: Kassakhian, Ardashes; Devine, Paula; Brotman, Daniel; Najarian, Ara; Agajanian, Vrej; Krause, Erik; Zurn, Stephen
Subject: Scholl Canyon....
Date: Sunday, August 30, 2020 11:08:00 AM

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My Friends,

L20-1 I'm writing this morning to discourage you from moving forward with the 12 megawatt power plant at the Scholl Canyon Landfill. My concerns are :

L20-2 Fire danger to the canyons adjacent, all accessed by windy narrow roads. We've seen what incredible damage can ensue.

L20-3 Air pollution from the project will exceed the SCAQMD thresholds.

L20-4 Earthquake potential.. we all know a 'big one' is coming, and the site is close to the fault line.

L20-5 Noise and pollution impact on the adjacent neighborhoods... we've already raised the ire of Eagle Rock residents, now you want to add to the list the residents of Glenoaks Canyon too?

L20-6 Instead, please consider your Alternative 2... which would clean up the gas to RNG standards and inject it into the Gas Company's pipeline. Certainly the possible upgrade of the landfill gas collection system would be cheaper than the proposed construction of a power plant.

Glendalians are counting on you to make the right decision. Please be thoughtful in your deliberations and consider Alternative 2. We do NOT want a huge power plant in Scholl Canyon.

Thank you,
Susan Hunt
725 Luring Drive
Glendale 91206

L21

From: Amy Koss
To: Krause, Erik
Cc: Agajanian, Vrej; Devine, Paula; Kassakhian, Ardashes; Brotman, Daniel; Najarian, Ara
Subject: Scholl Canyon Biogas Plant DEIR
Date: Monday, August 31, 2020 7:36:04 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

L21-1 Dear Eric Krause, and whoever can stop this before it gets worse,

L21-2 Over the 25 years that I've lived in Glendale the air quality has deteriorated. The dust on windowsills, bookshelves, all surfaces, accumulates more rapidly, and its texture more grime than dust.

L21-3 Similarly, the crusty deposits left by our tap-water on my glass tea-kettle and appliances build up much more quickly than before.

L21-4 And, of course, no one has missed the increased frequency of our brush fires.

I assume these sorrows are largely the result of poor decisions made long ago, by people who didn't know better. Or perhaps, they knew better but the situation was complicated. Perhaps greed factored in.

Now, Glendale again has the opportunity to make decisions that will affect future Glendalians in ways we can not fully predict. Luckily we can look around and see how others made similar decisions and study their outcomes. We can ask experts who have no skin in the game. We can't know the future, but we can guess, and we can hope to be right and do the right thing,

L21-5 Allowing a bio-gas power plant to be built in a fire zone, on an earthquake fault line, in a heavily populated neighborhood, can only be wrong. The potential for catastrophe is impossible for even the least civic-minded or imaginative Glendale resident to ignore. If any of the many predictable horrors were to come to pass as a result of allowing such a thing, no one would be surprised.

Instead, let's take this opportunity, as a city, as a band of people passing through, to get this one right.

L21-6 Maybe renewable natural gas is a safer, smarter, cleaner, less humiliating solution?

Thank you,
Amy G Koss

Amy Goldman Koss
www.AmyGoldmanKoss.net
AmyKossBlogThang.blogspot.com

L22

From: eduardo escobar
Sent: Monday, August 31, 2020 10:54 AM
To: ekrause@glendaleca.gov
Subject: Proposed Biogas Plant/Scholl Canyon Landfill

Dear Mr. Krause,

L22-1 The following communication is to express my serious concerns about the proposed Biogas Plant to be built at the Scholl Canyon Landfill.

L22-2 This proposed Biogas project would:

- Be too close to residents in Glenoaks Canyon; only half mile from nearest home
- L22-3 Be processing methane, a highly explosive gas to produce electricity in a very high risk fire zone (There was a fire in this area on Aug. 25, 2019, another fire last Saturday Aug. 29, 2020 and numerous fires over the last decade)
- L22-4 Increase air pollution
- L22-5 Increase cancer risk for area residents
- L22-6 Be running twenty-four hours a day; seven days per week and would be noisy
- L22-7 Reach capacity in 2030 according to the Environmental Impact Report

L22-8 A more sound and reasonable alternative is to locate the project at Grayson and the landfill gas should be piped there as in the past. Cleaning landfill gas to renewable natural gas would be a better choice for nearby residents as it would create minimal air pollution and less health hazards.

In advance, we thank you for reading this letter and your consideration of this matter.

Sincerely,

Janise and Eduardo Escobar
Glenoaks Canyon residents

Sent from Mail for Windows 10

Virus-free. www.avg.com

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

Thank you.

Sincerely,

Eduardo Escobar
524 Arch Pl.
Glendale, CA 91206

SANTA CLARITA CA 913

31 AUG 2020 PM 4 L



Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

91206-431128

=========fold=========

=========fold=========

L23

From: eduardo escobar
To: Krause, Erik
Subject: Proposed Biogas Plant/Scholl Canyon Landfill
Date: Monday, August 31, 2020 10:54:26 AM
Importance: High

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Krause,

L23-1 The following communication is to express my serious concerns about the proposed Biogas Plant to be built at the Scholl Canyon Landfill.

L23-2 This proposed Biogas project would:

- Be too close to residents in Glenoaks Canyon; only half mile from nearest home
- L23-3 Be processing methane, a highly explosive gas to produce electricity in a very high risk fire zone (There was a fire in this area on Aug. 25, 2019, another fire last Saturday Aug. 29, 2020 and numerous fires over the last decade)
- L23-4 Increase air pollution
- L23-5 Increase cancer risk for area residents
- L23-6 Be running twenty-four hours a day; seven days per week and would be noisy
- L23-7 Reach capacity in 2030 according to the Environmental Impact Report

L23-8 A more sound and reasonable alternative is to locate the project at Grayson and the landfill gas should be piped there as in the past. Cleaning landfill gas to renewable natural gas would be a better choice for nearby residents as it would create minimal air pollution and less health hazards.

In advance, we thank you for reading this letter and your consideration of this matter.

Sincerely,

Janise and Eduardo Escobar
Glenoaks Canyon residents

Sent from Mail for Windows 10

Virus-free. www.avg.com

L24

From: Phil Lee
To: Krause, Erik
Subject: Scholl Canyon Landfill proposed power plant
Date: Monday, August 31, 2020 11:22:27 PM

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Dear Mr. Krause:

L24-1 I am a resident of Glendale living in Chevy Chase Canyon, and am concerned about the
L24-2 proposed power plant at Scholl Canyon. Air quality is of course the greatest concern, but
L24-3 noise and other disturbances are concerning as well. Please let me know what environmental studies have been done or are planned to be done.

Thank you,
Philip Lee
3136 Kirkham Dr.
Glendale CA 91206

L25

From: sschus
To: Krause, Erik
Cc: Devine, Paula
Subject: GWP's DEIR for the Biogas Renewable Generation Project
Date: Monday, August 31, 2020 3:44:48 PM

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Mr. Krause:

Are you as disappointed as I am with the subject document?

L25-1 The DEIR put together by GWP lacks attention to many important details and offers only a cursory discussion of alternative approaches for dealing with the methane gas created at the Scholl Canyon landfill.

L25-2 I hope you, as Glendale's Principal Planner, will require GWP to answer many questions/issues not covered AND minimally to provide you, the City Council and the public with a more comprehensive review of alternatives to the option they are proposing to pursue. Qualitative aspects such as aesthetics, air quality, biological impacts, water contamination, noise and very importantly, fire danger need to be considered as well as quantitative implications.

L25-3 Many topics covered by the DEIR raise almost more questions than they answer. I'm sure you must have found this to be true. As an example, Grayson and Scholl are closely connected – not only regarding the landfill gas pipeline, but because both contribute to Glendale's total energy needs and its renewable portfolio. Yet this doesn't seem to have been consistently considered in the discussion of pollution/air quality.

L25-4 And speaking of air quality, I hope GWP will explore the possibility of immediately replacing the highly polluting old flares now in operation with new ones, as flares will be used until whatever approach is put into place.

L25-5 I know the residents who live near the Scholl Canyon landfill will be in touch with you and the city with a lot more detailed comments about the DEIR, so I will keep it simple with the above requests.

Respectfully submitted,

Stephanie Schus Russin
Royal Blvd.

L26

From:	Becky Newman
To:	Krause, Erik
Cc:	Agajanian, Vrej; Devine, Paula; Kassakhian, Ardashes; Brotman, Daniel; Najarian, Ara
Subject:	Comments on Scholl Canyon DEIR
Date:	Tuesday, September 01, 2020 8:01:43 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Krause,

I am a seven-year resident of Eagle Rock with my husband and my 16-month-old baby. Below are my comments and concerns regarding the DEIR:

L26-1 • GWP must evaluate what fire mitigation is needed now, when the landfill gas is being flared 100% of the time.

L26-2 • The City of Glendale needs to look immediately into new flares to improve air quality. Flares will be used as backup for the proposed project and for all alternatives.

L26-3 • The Scholl Canyon Landfill area is surrounded by residential and recreation areas and should not be further industrialized. My family is particularly concerned about the aesthetics, air quality, biological impacts, water contamination, noise, and fire danger of this proposed project in an earthquake-prone area.

L26-4 • **GWP should perform an impartial and quantitative discussion of all of the alternatives. More details are needed in particular on Alternative 2, which contemplates cleaning up the gas to renewable natural gas (RNG) standards and delivering it to the gas company. Alternatively, the cleaned up RNG could generate electricity at Grayson or be used in fuel cells or other options. At least some of the gas cleanup could occur at Grayson.**

L26-5 • A single combined EIR for Grayson and Scholl, discussing energy needs, renewable portfolio, and landfill gas utilization, needs to be done. Grayson and Scholl are completely connected, both physically, by the landfill gas pipeline, and also by the fact that both sites are parts of Glendale's overall electricity production and renewable portfolio. At least two of the alternatives rely on using Grayson facilities.

L26-6 • GWP needs to assure the public that nothing that is done with the landfill gas will affect the current closure criteria for the landfill. It should not be rezoned as industrial and a Conditional Use Permit (CUP) should not be granted.

L26-7 • GWP needs to show the impact of the proposed project on the site after the landfill closes, since the proposed project is likely to continue to function 10 or more years past the closure date of the landfill, because landfill gas will continue to be emitted.

There are a number of other major issues with the DEIR:

L26-8 **Air Quality**: Pollution from the project will exceed the South Coast Air Quality Management District's (SCQAMD) thresholds for four contaminants, but the DEIR does not discuss either mitigation or using the best available control technology (BACT). Instead, the DEIR assumes that GWP will get priority reserve credits to eliminate the pollutants on paper. Measurements of the pollutants are made from monitors that are not near the landfill.

The DEIR also ignores carcinogenic pollutants such as dioxins and furans.

L26-9 **Geology and Soils**: The project will be located atop a mountain that sits near a potential 6.7 earthquake fault. Seismic waves on a mountain can be amplified 4 or 5 times those of field waves,

L26-9 and the report both gives insufficient mitigation measures for threats to power equipment, buildings, tanks, and pipelines and fails to present emergency back-up systems to mitigate damage from earthquakes or fire.

L26-10 **Wildfire:** Wildfire is a huge risk to Glenoaks and Chevy Chase Canyons, Linda Vista, and Eagle Rock due to its location in a designated very high fire zone. These neighborhoods have mostly narrow, single-access roads. The wildfire plan minimizes the danger and carelessly and erroneously assumes that an on-site water tank and a fire department more than 5 miles away are sufficient.

L26-11 **Project Details:** Many significant details are missing, including views of the project as proposed and as it will look when the landfill closes. How will the project impact the intended future recreation use of the site? What are the current landfill gas constituents and gas flow rate? Why were these engines chosen instead of other alternatives such as turbines?

L26-12 **Aesthetics:** The 60,000-gallon water tank and the 40-foot tall engines will be visible from surrounding residential neighborhoods and will likely be visible from trails when the area reverts to a recreation area.

L26-13 **Biological Resources:** The potential biological impact does not address key species. In addition, these hills serve as a wildlife corridor that could be disrupted by the project.

L26-14 **Energy:** Although the project will utilize the energy that is currently being flared, there may be alternatives that can use the gas with less impact on the environment.

L26-15 **Greenhouse Gas (GHG) Emissions:** The GHG numbers for the proposed project in Section 4.6 are inconsistent with the numbers in Appendix F. Using the numbers from Appendix F and the baseline flare numbers from Section 4.6 shows that the GHG emissions may increase more than the significance threshold of 10,000 metric tons of carbon dioxide equivalent per year. It is altogether unclear where the proposed project numbers in Section 4.6 come from.

L26-16 **Hazards and Hazardous Materials:** Hazards need to include the effect of earthquakes and fire on the hazards listed, such as the lube oil and waste oil tanks, and the natural gas line.

L26-17 **Hydrology and Water Quality:** The landfill is unlined; therefore, the proposed project must ensure that oil and other contaminants are contained to protect the groundwater. In addition, more groundwater monitoring needs to be done to assure no release and migration of hazardous materials.

L26-18 **Land Use & Planning:** The landfill and its closed sections operate under a Variance to the Special Recreation zoning use that applies to the entire area. Residential zones encircle the facility. These zoning designations reflect the long-held intent that the entire area would revert to recreational uses once the landfill is closed. It will likely reach its fill limit within 10 years. The project requires a Conditional Use Permit, which would open the door to further industrialization. Residents in the surrounding areas strongly oppose this change.

L26-19 **Noise:** The chosen engines put out sound in very low frequencies 24/7. The analysis chart only goes down to 31.5 Hz, while humans can hear down to 20 (and can feel below that). Coupled with the difficulty the terrain makes for analysis, this could be harmful to both humans and animals.

L26-20 **Transportation:** The report underestimates the project's impact on transportation by not including

L26-20 increased traffic during construction on Glenoaks Blvd. and by not addressing Colorado Blvd., especially near Figueroa Ave., at all.

L26-21 **Utilities and Service Systems:** This section needs a full discussion of the natural gas line and why it is not underground.

L26-22 **Alternatives:** GWP picked the proposed project without a detailed study of the alternatives. **An impartial and quantitative discussion of the alternatives is needed, particularly Alternative 2, which cleans up the gas to renewable natural (RNG) gas standards and injects it into the gas company's pipeline.** Distributing the gas cleaning processes between Scholl and Grayson should also be explored.

Thank you for your consideration of my family's serious concerns.

Becky Newman
Resident of Los Angeles, CA 90041 (Eagle Rock)

L27

From:	Teurn, Nai@CalRecycle
To:	"state.clearinghouse@opr.ca.gov"
Cc:	Krause, Erik; Escotto, Benjamin@CalRecycle; Dorcas Hanson-Lugo
Subject:	SCH No. 2017081062 Draft EIR Biogas Renewable Generation Project, Scholl Canyon Landfill, Facility No. 19-AA-0012 - CalRecycle Comment Letter
Date:	Tuesday, September 01, 2020 3:40:21 PM
Attachments:	Draft EIR Biogas Renewable Generation Project CalRecycle Comment Letter.pdf

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SCH,

L27-1 In an effort to assist in your transition to a paperless process, attached is CalRecycle staff's comment letter for **SCH No. 2017081062** – Draft EIR Biogas Renewable Generation Project, Scholl Canyon Landfill, Facility No. 19-AA-0012 – Los Angeles County.

Thank you.

Nai Teurn
PH: (916) 323-1799
FX: (916) 319-7589
Nai.Teurn@CalRecycle.ca.gov

Department of Resources Recycling and Recovery (CalRecycle)
Waste Permitting, Compliance and Mitigation Division
Permits and Assistance South Unit
1001 I Street
P.O. Box 4025, MS 10A-17
Sacramento, CA 95812-4025

September 1, 2020

Erik Krause, Deputy Director of Community Development
City of Glendale
633 East Broadway, Room 103
Glendale, CA 91206

Subject: **SCH No. 2017081062** – Draft Environmental Impact Report for Biogas Renewable Generation Project, Scholl Canyon Landfill (Facility No. 19-AA-0012) – Los Angeles County

Dear Mr. Krause:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the Draft Environmental Impact Report (Draft EIR) and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

PROJECT DESCRIPTION

L27-2

The City of Glendale, acting as Lead Agency, proposes to construct and operate a 12-megawatt (MW) power generation facility that would utilize landfill gas (LFG) from Scholl Canyon Landfill, Facility No. 19-AA-0012, as fuel to generate renewable energy. The project site will be located entirely within the boundaries of Scholl Canyon Landfill, at 3001 Scholl Canyon Road, in the City of Glendale. The project specifically will be located adjacent to the existing LFG flare station and would include the following equipment and systems:

- LFG compressors to increase the LFG pressure;
- LFG treatment system;
- Condensate treatment system;
- Electrical generating equipment;
- Combustion exhaust gas cleanup system;
- Continuous emission monitoring systems;
- Electric switchgear to allow connection of the produced electricity to the existing electrical system;
- A small office and storage building (less than 1,000 square feet each);
- Fire protection and safety system; and,
- A 60,000-gallon fire water tank and a 10,000-gallon domestic water storage tank.

A 3,500 foot natural gas pipeline will be constructed that would connect the facility to the Southern California Gas Company pipeline system located at the eastern end of Scholl

L27-2 Canyon Drive. A one-mile-long water pipeline will also be constructed that would connect the facility to an existing pipeline located north of the landfill, which will also allow the connection to fire hydrants. Additional water pipelines will be constructed below the power generation facility to connect the facility to the domestic water tanks. The existing five-mile-long gas pipeline will be abandoned. The entire project site will be enclosed within an eight-foot-high security fence with automatic gates and security and safety lighting systems.

COMMENTS

L27-3 CalRecycle staff's comments on the proposed project are listed below. Where a specific location in the document is noted for the comment, please ensure the comment is addressed throughout all sections of the Draft EIR, in addition to the specific location noted. Comments on the Draft EIR are summarized below:

L27-4 Pages 4.250 and 4.252, Section 4.10.3.1 Methodology – Tables 36 and 38 have the language, "Exiting Ambient Noise Level (dBA)." Please clarify if the word "Exiting" was misspelled and should be "Existing."

L27-5 Page 4.251, Section 4.10.3.1 Methodology – At the end of the first paragraph, Appendix H is mentioned in regards to modeled noise level contour maps. The last paragraph also mentions Appendix H in regards to a list of equipment and assumed noise levels generated by the project. In the table of contents list of appendices, Appendix H is labeled as "Pre-Demolition Asbestos and Lead-Based Paint Survey." The appendix itself also provides the same information for pre-demolition asbestos and lead-based paint. Please clarify the accuracy of references to Appendix H in this section for noise.

L27-6 Solid Waste Regulatory Oversight
Prior to the start of operation, the proposed project must be adequately described in the Joint Technical Document (JTD) for the Scholl Canyon Landfill. Per Title 27, California Code of Regulations (27 CCR), Section 21620, the operator shall submit proposed changes in design or operation to the Local Enforcement Agency (LEA) for review and approval at least 180 days prior to implementation. The Los Angeles County Department of Public Health is the LEA for Los Angeles County and responsible for providing regulatory oversight of solid waste handling activities, including inspections and permitting. Please contact Dorcas Hanson-Lugo of the LEA at 626.430.5540 or dlugo@ph.lacounty.gov to discuss the regulatory requirements for the proposed project.

CONCLUSION

L27-7 CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the Draft EIR and hopes that this comment letter will be useful to the Lead Agency preparing the Final EIR and in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project.

L27-8 If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision-making body.

L27-9 If you have any questions regarding these comments, please contact me at 916.323.1799 or by e-mail at nai.teurn@calrecycle.ca.gov.

Sincerely,



Nai Teurn, Environmental Scientist
Permitting & Assistance Branch – South Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Benjamin Escotto, Supervisor
Permitting & Assistance Branch – South Unit

Dorcas Hanson-Lugo, Chief
Los Angeles County Department of Public Health, LEA

L28

Sept 1, 2020

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L28-1 My husband and I have lived in Glenoaks canyon for over fourty years. As you know, there is only one way in and out of our canyon. We have experienced fires and the need to evacuate in a hurry. We also have sustained earthquake damage. We feel the proposed Biogas Plant will cause an additional hazard in times of fires and earthquakes! Processing methane gas which is an explosive gas which would cause us additional damage. A methane leak would cause or could cause deaths and have long term effects on us all and our children! Glenoaks elementary school is at the base of our canyon with children coming from other neighborhoods. An explosion

L28-2 at a Biogas plant or a leak would cause massive damage and loss of life. Leaving the canyon on a two lane road could be impossible especially when school is insession. We would not be able to detect methane gas in time to save our lives and the

L28-3 lives of our neighbors. There also could be an increase in cancer risk for us and our children. We love

L28-4 our canyon nature and this plant would disrupt the landscape also. PLEASE Reconsider!

Thank you.

Sincerely,

Lacy and Laurel Halton

Ms. Laurel J. Haltom
2640 Hollister Ter.
Glendale, CA 91206-3119

SANTA CLARITA CA 913
1 SEP 2020 PM 2 L



Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

912068431

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L29

From: marie-ange Vuillemin
To: Krause, Erik
Subject: AGAINST POWER PLANT!
Date: Tuesday, September 01, 2020 1:51:52 AM

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L29-1 KEEP GLENDALE BEAUTIFUL AND « BREATHABLE »!!!

L30

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L30-1 ✓ It would be too close to residents in Glenoaks Canyon – only 1/2 mile from the nearest house.

L30-2 ✓ It would increase air pollution.

L30-3 ✓ It would increase cancer risk.

Thank you.

Sincerely,

Randy Glass

Randy Glass
Glenoaks Canyon

R Glass
2351 E. Glenoaks Blvd
Glendale, CA 91206

SANTA CLARITA CA 913
1 SEP 2020 PM 2 L



Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

91206-431128

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==========fold==========

L31

From: Gina Esposito
To: Krause, Erik
Subject: Power Plant Opposition
Date: Wednesday, September 02, 2020 12:38:27 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Erik and members of the Glendale City Council,

L31-1 I'm writing today as a long time resident of Glendale, a mother of 2 young children and a homeowner in Glenoaks Canyon, to voice my utmost concerns regarding the proposed GWP hillside power plant project in our area.

L31-2 I'm deeply worried about this becoming a health issue for, as we now call humans, "sensitive subjects" which include seniors and children. I'm concerned about the environmental implications that were not sufficiently discussed in the impact report. I"m concerned about a POWER PLANT, again, a POWER PLANT, less than 1/2 mile from residents in multiple cities. Since when do we dismiss the fact that this is in a residential neighborhood in favor of the needs of a business?

L31-3 I've lived in Glendale, CA almost my entire life. I chose to come back to Glendale, purchase a home, and raise my 2 children here because Glendale has always operated in a way that looked out for the best interests of its residents before its big business needs.

L31-4 I'm extremely concerned about a POWER PLANT located amongst homes, in a high fire risk zone. Especially at a time where we are all being asked to stay home.

L31-5 My list of concerns for air quality, pollution, mismanagement, fire, health and environmental safety go on and on. I do not plan to move, but I do plan to stay vocal and fight as long as this proposed project is being championed.

L31-6 Please continue to be the city council you've always been known to be - educated, compassionate, and progressive.

I stand firmly against the building/expansion of the Scholl Power Plant.

Thank you for your time and service,

Gina Esposito

L32

From: Christine Holland
To: Krause, Erik
Subject: Please do not proceed with the current Biogas Project
Date: Thursday, September 03, 2020 1:17:47 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Christine Holland has sent you an email via **Gmail confidential mode:**

Please do not proceed with the current Biogas Project

This message was sent on Sep 3, 2020 at 1:16:29 PM PDT
You can open it by clicking the link below. This link will only work for ekrause@glendaleca.gov.

View the email

Gmail confidential mode gives you more control over the messages you send. The sender may have chosen to set an expiration time, disable printing or forwarding, or track access to this message. Learn more

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Christine Holland
to ekrause
Sep 3
Details

Erik Krause
Deputy Director of Community Development
City of Glendale, Community Development Department
633 East Broadway, Room 103
Glendale, CA 91206-4386

Dear Mr. Krause,

I am writing to express my direct concerns about the construction of a Biogas project on the Scholl Landfill.

PLEASE DO NOT PROCEED WITH THIS PROJECT.

L32-1

I have been a life long resident of Chevy Chase Canyon and now a homeowner in Glenoaks Canyon. Our canyon enclaves are special, and if this project continues, we (my parents who are homeowners in Chevy Chase Canyon and my family) will likely have to move to a ecologically safer, yet less desirable areas. We love our homes, and do not want our lives to be jeopardized. Please note, NO ONE SUPPORTS THIS PROJECT except people profiting from it. We believe there are better alternatives.

Many residents of our canyons are elderly. They will not be able to afford to buy a comparable house as their current homes (due to prop 13 loss and drops in our homes values) and they will be loosing their strong community and homes. Our community will likely move out of Glendale, because statistically, that is what happens. I personally will not want to live in a city that priorities money over human lives. To be clear, I believe this to be true because you are already aware of the increased pollution next to homes, schools, hospitals, and sports and recreation center, the close proximity to a major fault, and it being built in a high fire zone. So we must surmise this is monetarily driven. As you are likely aware, we are in such a high fire zone we can no longer obtain insurance outside of the California Fair Plan. I suspect this Biogas Project will be unable to be insured as well, if it is able to be insured will the homeowners around this project be covered too if it creates a disaster? This is not an investment that the rest of Glendale can safely make. I am sure the actuary models have said the same thing. I am fearful of how it will impact our ability to obtain insurance further.

L32-2

We are already within a very close proximity to a known EPA Superfund site, (please see, LINK OMITED SO YOU CAN READ THIS EMAIL) and to put us at additional risk is unconscionable.

L32-3

I pray no one is harmed because of the city council's actions and a better plan will be considered. We have all been through enough in 2020. Please stop this terrible project.

L32-4

Sincerely,
Dr. Christine Holland

L33

From: Elizabeth Park
To: Krause, Erik
Subject: Power plant
Date: Thursday, September 03, 2020 8:23:09 AM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Krause,

L33-1 Please reconsider the plan to build a power plant in Scholl Canyon. I have two children ages 3 and 5 and we live in the San Rafael neighborhood. Our neighborhood has many children as well as elderly residents, and this power plant would potentially have negative effects on everyone's health, especially the most vulnerable populations. Please keep Glendale a beautiful, healthy, and safe community for the residents.

Thank you so much for taking the time to read and consider this email.

Sincerely,
Elizabeth Park
--
Elizabeth Park

L34

From: Jaime Zinger
To: Krause, Erik
Subject: Scholl Canyon Biogas Plant DEIR
Date: Thursday, September 03, 2020 12:50:39 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Krause,

L34-1 I am writing to express my deep concerns over the proposed construction of a Biogas Plant project on the Scholl Canyon Landfill.

As a resident of Glenoaks Canyon I have the following concerns:

L34-2 1- I have young children and am very concerned about the increase in cancer risk caused by poor air quality/pollution.
a. Our air quality has already decreased due to the current flaring of the landfill gas at Scholl.

L34-3 2- We are in a very high fire zone- just the other night there was a fire IN the landfill. IN IT! Last year we were almost evacuated due to a fire. The fire situation is very real and no joke in this area. How can it be ok to build a plant that will process methane, a highly explosive gas to produce electricity in this very high fire zone?

L34-4 3- This is way too close to residents, an elementary school and the Verdugo Hills Fault.

L34-5 4- The landfill is unlined – how are we to be sure oil and other contaminants are not seeping into our soil and ground water that we drink?

L34-6 Everything about this project screams trouble to me. The outlined concerns I listed are just some of the many negative reasons this project should not proceed. Please do not move forward with this project and look into cleaning the landfill gas to renewable natural gas at an alternate location.

Thank you in advance for listening to my concerns, those of my family, and other residents in the area.

Respectfully,
Jaime Borenstein

L35

From: King, Karen (NBCUniversal)
To: Krause, Erik
Subject: Scholl Canyon Biogas Plant DEIR
Date: Thursday, September 03, 2020 10:21:33 AM

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Dear Mr Krause,

L35-1 I am writing to express my concerns over the proposed construction of a Biogas project on the Scholl Landfill.

As a resident of Glenoaks Canyon I have the following concerns.

1. L35-2 I have children and am concerned about the increase in cancer risk caused by poor air quality/pollution.
    a. Our air quality has already decreased due to the current flaring of the landfill gas at Scholl.
2. L35-3 This is way to close to residents, an elementary school and the Verdugo Hills Fault.
3. L35-4 We are in a very high fire zone- just the other night there was a fire IN the landfill. IN IT! Last year we were almost evacuated due to a fire. How can it be ok to build a plant that will process methane, a highly explosive gas to produce electricity in this very high fire zone?
4. L35-5 The landfill is unlined – how are we to be sure oil and other contaminants are not seeping into our soil and ground water?

L35-6 Everything about this project screams trouble to me. Please do not move forward with this project and look into cleaning the landfill gas to renewable natural gas at an alternate location.

Thank you,
Karen

L36

From: King, Karen (NBCUniversal)
To: Krause, Erik
Subject: RE: Scholl Canyon Biogas Plant DEIR
Date: Thursday, September 03, 2020 12:12:29 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

L36-1 My apologies for the additional email but I realized I had a pretty significant typo in my original email. I've corrected it below.

From: King, Karen (NBCUniversal)
Sent: Thursday, September 3, 2020 10:21 AM
To: ekrause@glendaleca.gov
Subject: Scholl Canyon Biogas Plant DEIR

Dear Mr Krause,

L36-2 I am writing to express my concerns over the proposed construction of a Biogas project on the Scholl Landfill.

As a resident of Glenoaks Canyon I have the following concerns.

1. L36-3 I have children and am concerned about the increase in cancer risk caused by poor air quality/pollution.
    a. Our air quality has already INcreased due to the current flaring of the landfill gas at Scholl.
2. L36-4 This is way to close to residents, an elementary school and the Verdugo Hills Fault.
3. L36-5 We are in a very high fire zone- just the other night there was a fire IN the landfill. IN IT! Last year we were almost evacuated due to a fire. How can it be ok to build a plant that will process methane, a highly explosive gas to produce electricity in this very high fire zone?
4. L36-6 The landfill is unlined – how are we to be sure oil and other contaminants are not seeping into our soil and ground water?

L36-7 Everything about this project screams trouble to me. Please do not move forward with this project and look into cleaning the landfill gas to renewable natural gas at an alternate location.
Thank you,
Karen

L37

Recd Sept. 10, 2020

09/04/20

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L37-1 1.) It will be a significant cancer increased risk to our beautiful daughter – age 6, as well as my husband and I.

L37-2 2.) The Environmental Impact Report says the landfill will reach capacity in 2030.... why bother bringing a plant here with so few years left in the landfill? It should be located at Grayson, and the landfill gas should be piped there.

L37-3 3.) It would be processing methane, a highly explosive gas, to produce electricity in a very high fire zone. We had to evacuate last year!

L37-4 4.) It would be too close to us, my family, in Glenoaks Canyon... only 1/2 mile from my child sleeping at night.

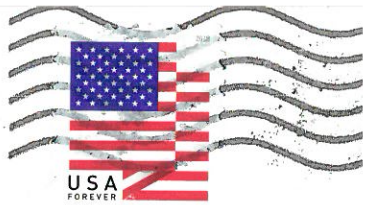
Thank you.

Sincerely,

Gregg + Summer Wiese
2737 Valle Vista Dr.
Homeowners in Glenoaks Canyon since 2015 with a 6 year old daughter

The Wiele Family
2737 Valle Vista Dr.
Glendale, CA
91206

RITA CA 913
4 SEP 2020 PM 1 L



Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

91206-431128

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L38

From: Summer Stearns
To: Krause, Erik
Cc: Gregg Wiele
Subject: The Wiele Family's Concerns re: Scholl Canyon Biogas Plant DEIR
Date: Friday, September 04, 2020 11:21:37 AM

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Good morning Mr. Krause,

My family resides in Glenoaks Canyon, and the following are my comments about the proposed Biogas Plant to be built at Scholl Canyon Landfill:

L38-1 1. I have a 6 year old daughter, and this plant would lead to a significant cancer risk for her, my husband and I, as we live less than half a mile away from the landfill.

L38-2 2. The environmental impact report says the landfill will reach capacity in 2030... why bother building a plant here, with so few years left in the landfill?

L38-3 3. It would be processing methane, a highly explosive gas, to produce electricity in a very high fire zone. We had to evacuate last year due to the fire in the canyon.

L38-4 4. It is proposed to run 24/7 with significant noise, destroying property value, and the peaceful sound of our beloved canyon.

Thank you for listening to our concerns.

Kind regards,
Gregg, Summer, and Brooklyn Wiele
2737 Valle Vista Drive
Glenoaks Canyon

L39

From: Donielle Lemone
To: Krause, Erik
Subject: School Canyon Concerns
Date: Saturday, September 05, 2020 6:10:50 AM

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Dr. Mr. Krause,

L39-1 I wanted to give my input as a Glendale resident on the proposals for Scholl Canyon. Living not too far from the landfill, my primary concerns are the wildfire risk and the flares. The plan should include new flares that emit less pollution and stronger wildfire projections. Given that

L39-2 Grayson and Scholl are connected and one of the options includes using gas generated at Scholl at Grayson an EIR for how both facilities are connected should be conducted.

Thanks,
Donielle

L40

From: Amy Ataya
To: Krause, Erik
Subject: Proposed Glendale Water and Power Power Plant at the Scholl Canyon Landfill
Date: Sunday, September 06, 2020 4:20:20 PM

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L40-1 We have lived in Glenoaks Canyon since 2000. PLEASE do not build a power plant at the Scholl Canyon Landfill.

L40-2 1. It would be too close to residents in Glenoaks Canyon, only 1/2 mile from the nearest house.

L40-3 2. It would be processing methane, a highly explosive gas, to produce electricity in a very high fire zone.

L40-4 3. It would increase air pollution.

L40-5 4. It would increase cancer risk.

L40-6 5. It would be running 24 hours a day/seven days a week and would be noisy.

L40-7 6. It would be located only 1/2 mile from the Verdugo Hills Fault which has the potential to cause a 6.7 magnitude earthquake.

L40-8 7. It would have a 60,000-gallon water tank and 40-foot engines on a primary ridgeline, visible in the Eagle Rock area.

L40-9 8. The Environmental Impact Report says the landfill will reach capacity in 2030, why bring a plant here now with so few years left in the landfill? It should be located at Grayson and the landfill gas should be piped there as in the past.

Thank-you,
Marwan and Amy Ataya

L41

From: pecesq@sbcglobal.net
To: Krause, Erik; Agajanian, Vrej; Devine, Paula; Kassakhian, Ardashes; Brotman, Daniel; Najarian, Ara
Subject: Opposition to Scholl Canyon Biogas Plant DEIR -- NO HILLSIDE POWER PLANT IN GLENDALE!
Date: Sunday, September 06, 2020 10:04:43 PM

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September 6, 2020

TO: Mr. Eric Krause
ekrause@glendaleca.gov

CC: Glendale City Council Members
vagajanian@glendaleca.gov;
pdevine@glendaleca.gov;
AKassakhian@Glendaleca.gov;
dbrotman@glendaleca.gov;
anajarian@glendaleca.gov

Re: Opposition to Scholl Canyon Biogas Plant DEIR -- NO HILLSIDE POWER PLANT IN GLENDALE!

L41-1 My name is Priscila Kasha. I am an attorney, and my family has lived in Glenoaks Canyon since 1974, over 45 years. We own 3 houses in the Canyon. My sister and I attended all Glendale local public schools--Glenoaks Elementary, Wilson Jr. High, and Glendale High School. We are heavily invested in this community. When we were young, we always played at Glenoaks Park and rode our bikes through the Canyon and always felt safe. We currently walk in the neighborhood regularly for exercise. We love smelling the fresh air and seeing neighbors walk the Canyon.

L41-2 **Background**: Glendale Water & Power (GWP) wants to build a 12-megawatt power plant on the Scholl Canyon Landfill to turn landfill gas into electricity. The draft Environmental Impact Report for the project (DEIR) claims that the proposed "Project would not result in any significant and unavoidable environmental impacts." GWP proposes only minor mitigation measures in the areas of biological resources and wildfire. For decades the landfill gas had been sent via a pipeline to the Grayson Power Plant and turned into electricity there. In April 2016, the City of Glendale stopped this process, claiming that pollution near Grayson exceeded acceptable levels due to the old Grayson equipment. Since that time, the landfill gas has been burned, or "flared," at Scholl. There are many serious and dangerous impacts to the surrounding

L41-2 neighborhoods.

The Landfill Needs to Shut Down! The City must look at the proposed projects holistically. For example, ***the landfill was legally required to be closed in 1987 per the Joint Power Agreement but it has stayed open***. A few years ago, the City proposed to expand and/or extend the landfill and those proposals are hanging out there unresolved. There is excess capacity at the landfill that Glendale ***sells to other cities for a profit***. The Scholl Canyon residents don't feel this is fair since the environmental burdens are suffered most by them. The residents want to avoid putting a project at Scholl that would enable the landfill to continue in perpetuity since it is already long past its original expiration date.

L41-3

General Concerns:

L41-4 * GWP must evaluate what fire mitigation is needed *now*, when the landfill gas is being flared 100% of the time.

L41-5 * The City of Glendale needs to look immediately into new flares to improve air quality. Flares will be used as backup for the proposed project and for all alternatives.

L41-6 * The Scholl Canyon Landfill area is surrounded by residential and recreation areas and should not be further industrialized. We are particularly concerned about the aesthetics, air quality, biological impacts, water contamination, noise, and fire danger of this proposed project in an earthquake-prone area.

L41-7 * GWP should perform an impartial and quantitative discussion of all of the alternatives. More details are needed in particular on Alternative 2, which contemplates cleaning up the gas to renewable natural gas (RNG) standards and delivering it to the gas company. Alternatively, the cleaned up RNG could generate electricity at Grayson or be used in fuel cells or other options. At least some of the gas cleanup could occur at Grayson.

L41-8 * A single combined EIR for Grayson and Scholl, discussing energy needs, renewable portfolio, and landfill gas utilization, needs to be done. Grayson and Scholl are completely connected, both physically, by the landfill gas pipeline, and also by the fact that both sites are parts of Glendale's overall electricity production and renewable portfolio. At least two of the alternatives rely on using Grayson facilities.

L41-9 * GWP needs to assure the public that nothing that is done with the landfill gas will affect the current closure criteria for the landfill. It should not be rezoned as industrial, and a Conditional Use Permit (CUP) should not be granted.

L41-10 * GWP needs to show the impact of the proposed project on the site after the landfill closes, since the proposed project is likely to continue to function 10 or

L41-10 more years past the closure date of the landfill, because landfill gas will continue to be emitted.

L41-11 **** Property values will plummet*** in Glenoaks Canyon. Like Porter Ranch, here a public service is located in a very close proximity to a huge residential area. Methane gas can leak from a garbage dump causing serious potential hazards and resulting in huge liability to the City if something goes terribly wrong. This would be personally devastating for us.

Major Issues with the DEIR:

L41-12 **Air Quality**: Pollution from the project will exceed the South Coast Air Quality Management District's (SCQAMD) thresholds for four contaminants, but the DEIR does not discuss either mitigation or using the best available control technology (BACT). Instead, the DEIR assumes that GWP will get priority reserve credits to eliminate the pollutants on paper. Measurements of the pollutants are made from monitors that are not near the landfill. The DEIR also ignores carcinogenic pollutants such as dioxins and furans.

L41-13 **Geology and Soils**: The project will be located atop a mountain that sits near a potential 6.7 earthquake fault. Seismic waves on a mountain can be amplified 4 or 5 times those of field waves, and the report both gives insufficient mitigation measures for threats to power equipment, buildings, tanks, and pipelines and fails to present emergency back-up systems to mitigate damage from earthquakes or fire.

L41-14 **Wildfire:** Wildfire is a huge risk to Glenoaks and Chevy Chase Canyons, Linda Vista, and Eagle Rock due to its location in a designated very high fire zone. These neighborhoods have mostly narrow, single-access roads. The wildfire plan minimizes the danger and carelessly assumes that an on-site water tank and a fire department more than 5 miles away are sufficient.

L41-15
- Recently, ***many Glenoaks Canyon residents have received fire insurance cancellation notices because of the extreme fire risk*** that already exists due to climate change and other factors. ***Putting a power plant on the hillside will make matters dramatically worse and create a catastrophic risk to life and property***.

L41-16
- ***Have we not learned the hard lessons from largest gas leak in American history at Aliso Canyon?*** The Aliso Canyon massive leak caused thousands of local residents to have headaches, nausea, skin

rashes, and severe nosebleeds. Over 1,000 residents had to be relocated resulting in over 1,000 lawsuits plus criminal charges. The Aliso Canyon gas leak cost Southern California Gas Co. over ***$1 billion in costs***. Here, that enormous liability would be borne by the City of Glendale and its residents since the power plant would be owned by the City and not a private company. These gas facilities should never be put in the middle of a residential area *especially* in such a high fire risk zone like Glenoaks Canyon.

L41-16

Project Details: Many significant details are missing, including views of the project as proposed and as it will look when the landfill closes. How will the project impact the intended future recreation use of the site? What are the current landfill gas constituents and gas flow rate? Why were these engines chosen instead of other alternatives such as turbines?

L41-17

Aesthetics: The 60,000-gallon water tank and the 40-foot tall engines will be visible from surrounding residential neighborhoods and will likely be visible from trails when the area reverts to a recreation area.

L41-18

Biological Resources: The potential biological impact does not address key species. In addition, these hills serve as a wildlife corridor that could be disrupted by the project.

L41-19

Energy: Although the project will utilize the energy that is currently being flared, there may be alternatives that can use the gas with less impact on the environment.

L41-20

Greenhouse Gas (GHG) Emissions: The GHG numbers for the proposed project in Section 4.6 are inconsistent with the numbers in Appendix F. The numbers from Appendix F and the baseline flare numbers from Section 4.6 show that the GHG emissions may increase more than the significance threshold of 10,000 metric tons of carbon dioxide equivalent per year. It is altogether unclear where the proposed project numbers in Section 4.6 come from.

L41-21

Hazards and Hazardous Materials: Hazards need to include the effect of earthquakes and fire on the hazards listed, such as the lube oil and waste oil tanks, and the natural gas line.

L41-22

Hydrology and Water Quality: The landfill is unlined; therefore, the proposed project must ensure that oil and other contaminants are contained to protect the groundwater. In addition, more groundwater monitoring needs to be done to assure no release and migration of hazardous materials.

L41-23

L41-24 **<u>Land Use & Planning</u>:** The landfill and its closed sections operate under a Variance to the Special Recreation zoning use that applies to the entire area. Residential zones encircle the facility. These zoning designations reflect the long-held intent that the entire area would revert to recreational uses once the landfill is closed. It will likely reach its fill limit within 10 years. The project requires a Conditional Use Permit, which would open the door to further industrialization. Residents in the surrounding areas strongly oppose this change.

L41-25 **<u>Noise</u>:** The chosen engines put out sound in very low frequencies 24/7. The analysis chart only goes down to 31.5 Hz, while humans can hear down to 20 (and can feel below that). Coupled with the difficulty the terrain makes for analysis, this could be harmful to both humans and animals.

L41-26 **<u>Transportation</u>:** The report underestimates the project's impact on transportation by not including increased traffic during construction on Glenoaks Blvd. and by not addressing Colorado Blvd., especially near Figueroa, at all.

L41-27 **<u>Utilities and Service Systems</u>:** This section needs a full discussion of the natural gas line and why it is not underground. *Also, how will this 12-megawatt facility interconnect to the electric grid*? This is a major missing piece.

L41-28 **<u>Alternatives</u>:** GWP picked the proposed project without a detailed study of the alternatives and then backed into making them less attractive than the proposed project. An impartial and quantitative discussion of the alternatives is needed, particularly Alternative 2, which cleans up the gas to renewable natural gas (RNG) standards and injects it into the gas company's pipeline. Some vendors consider Alternative 2 an environmentally friendly and doable option, although it may require upgrading the landfill gas collection system. Distributing the gas cleaning processes between Scholl and Grayson should also be explored.

L41-29 **<u>Conclusion</u>**: ***We request that the landfill be closed as soon as possible and in the meantime that it be used only for Glendale residents*** and specifically Glenoaks Canyon residents. By doing this, the City will delay having to look for an alternate site for Glendale's own trash disposal needs at unknown costs in the future. We want to put this off for future generations and avoid being in the same position we are now. ***Please stop letting other cities use the site for monetary compensation***. The environment and our health take precedence over any amount of money.

There are over 2,000 residents in the Canyon, and we all currently enjoy the physical beauty of the surrounding environment. Glenoaks Canyon is truly a

L41-29 special place. We really don't want it to change.

Thank you for your attention to this important matter.

Sincerely,

Priscila Kasha
Attorney at Law
2418 Bywood Dr.
Glendale CA 91206

L42

From: GMAIL
To: Krause, Erik
Subject: Solar vs biogas
Date: Sunday, September 06, 2020 11:40:15 AM

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L42-1

It's time Glendale gets onboard with solar and works to reduce greenhouse gasses and burning gas.
Please consider increasing solar subsidies that are more inline with the most progressive cities here in California rather than relying on biofuels of any sort.
Kindest Regards-Wyndham Chow

L43

From: Emily Koss
To: Krause, Erik
Cc: Agajanian, Vrej; Devine, Paula; Kassakhian, Ardashes; Brotman, Daniel; Najarian, Ara
Subject: Biogas Project
Date: Monday, September 07, 2020 4:41:42 PM

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Dear Mr. Krause,

L43-1 My husband and toddler and I (pregnant with twins) live in Glenoaks Canyon in Glendale. As you must know, ours is a box canyon, meaning there is only one road in and out. Whoever decided to build a landfill at the top of this canyon, in a fire zone, is probably long dead and gone.
Were you and the City of Glendale to decide now to go ahead with building a power plant up there, you must also be hoping to be long dead or far away when it causes a mass casualty event, which you could have avoided.

Please consider our safety, and take the time to discover a safer option to deal with your predecessors' foolish mistakes.

Emily Koss

L44

From: Marguerita Drew
To: Krause, Erik
Cc: Agajanian, Vrej; Devine, Paula; Brotman, Daniel; Najarian, Ara; Kassakhian, Ardashes
Subject: Scholl Canyon Biogas Plant DEIR
Date: Monday, September 07, 2020 4:15:24 PM

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Mr. Krause,

L44-1 I have been living in Glenoaks Canyon for eight years and here I am, again, writing to a city official regarding the Scholl Canyon landfill site.

How many town meetings, city council meetings, DEIRs and complaints do our city officials have to witness before they accept the fact that Glendale citizens do NOT want a biogas plant on the Scholl Canyon landfill?

L44-2 Despite the talking points that have constantly been thrown at us, particularly by City Manager Steve Zurn, an energy plant of this nature poses considerable threats to the health of residents in Glenoaks Canyon, Eagle Rock, and the Linda Vista area of Pasadena, through increased air pollution, noise pollution, contamination of groundwater, as well as fire and earhtquake risk.

Given all of this, it is egregious that the city continues to forcefeed its citizens this plan.

L44-3 We are currently experiencing extreme heat and numerous wild fires in Southern California. Considering that this is the new normal, does the city really want to put a power plant on a hill surrounded by brush? Not to mention the fact that the proposed site for the plant is in close proximity to residents and their homes, AND there are schools on both the Glendale and Eagle Rock side of the landfill hill.

L44-4 Are Glendale politicians so callous that they don't even care for the health and safety of our children?

L44-5 I am going to ask again, nay, I *demand* - and I will continue to stand against this plan and demand - that our elected officials heed the wishes of their constituents, abide by their oaths to *serve* Glendale citizens, and reject the plan for a biogas plant at the Scholl Canyon site in favor of Alternative 2, which has gone largely ignored by our city council members.

L44-6 It is time for the city of Glendale to do the right thing for *all* of its citizens and live up to its "Jewel City" name.

Sincerely,
Marguerita Drew
2321 Hollister Canyon
Glendale Ca 91206
818-484-8926

L45

From: aida galusian
To: Krause, Erik
Subject: Scholl Canyon Biogas Plant DEIR
Date: Tuesday, September 08, 2020 11:36:51 AM

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Mr Erik Krause,

I have the following concerns/comments about the proposed Biogas Project:

L45-1 1. It would be too close to residents in Glenoaks Canyon, only 1/2 mile from the nearest house.

L45-2 2. it would increase air pollution.

L45-3 3. it would increase cancer risk.

L45-4 4. It would be located only 1/2 mile from Verdugo Hills Fault which has the potential to cause a 6.7 magnitude earthquake.

L45-5 5. It would be processing methane, a highly explosive gas, to produce electricity in a very high fire zone.

L45-6 6. It would be running 24 hours a day/ seven days a week and it would be noisy.

L45-7 7. The Environmental Impact Report says landfill will reach capacity in 2030, why bring a plant here now with so years left in the landfill? it should be located at Grayson and the landfill gas should be piped there as in the past.

L45-8 8. It would have a 60,000 gallon water tank and 40 foot engines on a primary ridge line, visible in the Eagle Rock area.

Thank you,
Aida Galusian

L46

From: Orbel Minassian
To: Krause, Erik
Subject: Scholl Canyon Biogas Plant Dier
Date: Tuesday, September 08, 2020 11:58:19 AM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Mr Erik Krause,

I have the following concerns/comments about the proposed Biogas Project:

L46-1 1. It would be too close to residents in Glenoaks Canyon, only 1/2 mile from the nearest house.

L46-2 2. it would increase air pollution.

L46-3 3. it would increase cancer risk.

L46-4 4. It would be located only 1/2 mile from Verdugo Hills Fault which has the potential to cause a 6.7 magnitude earthquake.

L46-5 5. It would be processing methane, a highly explosive gas, to produce electricity in a very high fire zone.

L46-6 6. It would be running 24 hours a day/ seven days a week and it would be noisy.

L46-7 7. The Environmental Impact Report says landfill will reach capacity in 2030, why bring a plant here now with so years left in the landfill? it should be located at Grayson and the landfill gas should be piped there as in the past.

L46-8 8. It would have a 60,000 gallon water tank and 40 foot engines on a primary ridge line, visible in the Eagle Rock area.

L47

From: Sharice B. Marootian
To: Krause, Erik
Subject: Scholl Canyon Biogas Plant DEIR
Date: Tuesday, September 08, 2020 11:11:46 AM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Krause,

L47-1 I write to you today as a parent, homeowner, and long-time community member in Glendale, and "the Canyon." I am VERY concerned about the proposal to build a Biogas power plant in our canyon, where we live, play and attend school. As you know, the power plant poses many threats to our health and enjoyment of a community we have long lived in. Our children attend Glenoaks Elementary, just a short distance from the proposed plant and we often (pre-pandemic) gather at Glenoaks Park and School Canyon Park. We want to continue to do so without the air pollution and cancer risk the power plant will pose. As you know, this proposed area is a high fire zone, and adding a plant to this area is irresponsible.

Please take these concerns to heart and stop the proposal in the City Council.

Best,
Sharice

Sharice B. Marootian | *Partner*
Law Offices of Abdulaziz, Grossbart & Rudman
Emphasizing Construction Law
6454 Coldwater Canyon Ave. | North Hollywood, CA 91606
☏:(818) 760-2000 | 🖷: (818) 760-3908
✉:sbm@agrlaw.com | 🛠:www.agrlaw.com

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For your protection: (1) e-mail communication is not a secure method of communication, (2) any e-mail that is sent to you or by you may be copied and held by various computers it passes through as it goes from us to you or vice versa, (3) persons not participating in our communication may intercept our communications by improperly accessing your computer or our computer or even some computer unconnected to either of us which the e-mail passed through. We are communicating to you via e-mail because you have consented to receive communications via this medium. If you change your mind and want future communications to be sent in a different fashion, please let me know AT ONCE.

L48

From: TALIN Minassian
To: Krause, Erik
Subject: Scholl Canyon Biogas Plant DEIR
Date: Tuesday, September 08, 2020 11:16:52 AM

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Mr Erik Krause,

I have the following concerns/comments about the proposed Biogas Project:

L48-1 1. It would be too close to residents in Glenoaks Canyon, only 1/2 mile from the nearest house.
L48-2 2. it would increase air pollution.
L48-3 3. it would increase cancer risk.
L48-4 4. It would be located only 1/2 mile from Verdugo Hills Fault which has the potential to cause a 6.7 magnitude earthquake.
L48-5 5. It would be processing methane, a highly explosive gas, to produce electricity in a very high fire zone.
L48-6 6. It would be running 24 hours a day/ seven days a week and it would be noisy.
L48-7 7. The Environmental Impact Report says landfill will reach capacity in 2030, why bring a plant here now with so years left in the landfill? it should be located at Grayson and the landfill gas should be piped there as in the past.
L48-8 8. It would have a 60,000 gallon water tank and 40 foot engines on a primary ridge line, visible in the Eagle Rock area.

Thank you,
Talin Minassian

L49

From: Teni Shahnazarian
To: Krause, Erik
Subject: Scholl Canyon Biogas Plant DEIR
Date: Tuesday, September 08, 2020 12:11:42 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Mr Erik Krause,

I have the following concerns/comments about the proposed Biogas Project:

L49-1 1. It would be too close to residents in Glenoaks Canyon, only 1/2 mile from the nearest house.
L49-2 2. it would increase air pollution.
L49-3 3. it would increase cancer risk.
L49-4 4. It would be located only 1/2 mile from Verdugo Hills Fault which has the potential to cause a 6.7 magnitude earthquake.
L49-5 5. It would be processing methane, a highly explosive gas, to produce electricity in a very high fire zone.
L49-6 6. It would be running 24 hours a day/ seven days a week and it would be noisy.
L49-7 7. The Environmental Impact Report says landfill will reach capacity in 2030, why bring a plant here now with so years left in the landfill? it should be located at Grayson and the landfill gas should be piped there as in the past.
L49-8 8. It would have a 60,000 gallon water tank and 40 foot engines on a primary ridge line, visible in the Eagle Rock area.

Thank you,
Teni Shahnazarian

L50

From: Erika Kraetsch
To: Krause, Erik
Subject: Scholl Canyon Biogas Plant DEIR
Date: Wednesday, September 09, 2020 8:29:40 AM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr Krause,

L50-1 I am writing to express my concerns over the proposed construction of a Biogas project on the Scholl Landfill.

As a resident of Woodbury, the next neighborhood to Glenoaks Canyon and a parent of children that goto Glenoaks Elementary, which is in Glenoaks Canyon, I have the following concerns.

L50-2 1- I have children and am concerned about the increase in cancer risk caused by poor air quality/pollution.
a. Our air quality has already decreased due to the current flaring of the landfill gas at Scholl.

L50-3 2- This is way too close to residents, an elementary school and the Verdugo Hills Fault.

L50-4 3- We are in a very high fire zone- just the other night there was a fire IN the landfill. IN IT! Last year we were almost evacuated due to a fire. How can it be ok to build a plant that will process methane, a highly explosive gas to produce electricity in this very high fire zone?

L50-5 4- The landfill is unlined – how are we to be sure oil and other contaminants are not seeping into our soil and ground water?

L50-6 Everything about this project screams trouble to me. Please do not move forward with this project and look into cleaning the landfill gas to renewable natural gas at an alternate location.

Thank you,
Erika Kraetsch

L51

From: Kate DiRienzo-Payne
To: Krause, Erik
Subject: Scholl Canyon Biogas Plant
Date: Wednesday, September 09, 2020 8:45:58 AM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Mr Krause

L51-1 I am writing to express my grave concern about the city's plan to build a Biogas POWER PLANT at the Scholl Landfill. I have young children who go to school in the canyon and play sports on the fields.

L51-2 In 2020, we should not be building structures that will be a major detriment to our health, environment and community. Especially on a landfill that was supposed to close in 10 years.

L51-3 On top of producing higher health risks, like cancer - it is putting highly explosive gas and electricity in an area already highly susceptible to fire. We are currently in the midst of one of the worst fire seasons in history and you are proposing we add fuel to an already deadly fire.

L51-4 We need to be forward thinking. We cannot keep building structures that are temporary fixes without thought of the impact on the community that invests so much in this city. It is fiscally and morally irresponsible.

Thank you for your time

Kate DiRienzo-Payne

L52

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L52-1 It would cause additional pollution (noise, smell, light).

L52-2 It would increase health risks (air-borne) in addition to existing soil/water/environmental pollution; there are already cancer-related issues likely as a result of the landfill.

L52-3 It would decrease quality of canyon life; including an on-going flare that would be newly visible & potentially reduce property values.

Be well!

Thank you.

Sincerely,

Angela Cohen

Recd Sept. 10, 2020

SANTA CLARITA CA 913

4 SEP 2020 PM 5 L

USA FOREVER

Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

91208-491128

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==========fold==========

L53

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

I have not heard from the supports of the Biogas Project but many of the opposition concerns that have been expressed in the Echo publication do seem relevant.

L53-1

More specifically, we in Glenoaks Canyon already have ~~o~~der and environmental damage concerns. We don't need more.

Thank you.

Sincerely,

Allen St. John
2721 E. Glenoaks Blvd
Glendale CA 91206-3111

Recd. Sept. 10, 2020

Mr. Allen St. John
2721 E Glenoaks Blvd
Glendale, CA 91206

SANTA CLARITA CA 913
8 SEP 2020 PM 3 L



Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

91206-431128

==========fold==========

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L54

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L54-1

Not only would the proposed Biogas Plant increase air pollution & the risk of cancer, but it would be processing methane, a highly explosive gas, to produce electricity in a very high fire zone. These are some of the concerns I have that cause me to consider leaving this lovely canyon should the Biogas Plant become a reality.

I appreciate your consideration in this matter.

Thank you.

Sincerely,

Ada Reed

Recd Sept. 10, 2020

Ms. Ann Reed
2716 E Glenoaks Blvd
Glendale, CA 91206

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Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

91206-431128

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L55

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L55-1 We live on GLENOAKS BLVD, our son attends GLENOAKS Elementary and he plays baseball and soccer up at Scholl park. We are seriously considering moving if the Biogas project moves forward for multiple reasons, including

L55-2 the fact that our son has underlying issues with asthma, and the increased pollution would be concerning, and that we lived in the Bay Area very close to the SAN BRUNO pipeline explosion where I served as A CERT volunteer. Having seen the aftermath of that incident, I am

L55-3 very concerned with the idea of going through that sort of tragedy again. I urge you to please consider

L55-4 halting this project, as the potential risks to the surrounding residents far outweigh the financial benefits.

rec'd. Sept. 10, 2020

Thank you.

Sincerely,

Brian Newlin

bnewlin@sonic.net



Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California ~~91026-4386~~ 91206

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L56

From: Elan Borenstein
To: Krause, Erik
Subject: Proposed Scholl Canyon Biogas Plant concern
Date: Thursday, September 10, 2020 11:53:14 AM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Krause,

L56-1 I am writing to express my deep concerns over the proposed construction of the Biogas Plant project on the Scholl Canyon Landfill. I am an engineer at the Jet Propulsion Laboratory where I characterize launch accident environments for missions carrying radioisotope power systems in support of NEPA and Presidential Launch Authorization.It just so happens that some developing launch vehicles plan to use Liquid Methane and Liquid Oxygen as their propellant and we have begun assessing their explosive behavior. Although these propellants are initially in liquid state (cryogenically cooled), they do gasify so I am also familiar with their gaseous reactions and properties. Let's be clear here, that although methane gas is 'clean' it is extremely flammable especially with an oxygen source (i.e. air). In addition, Methane is a heavy gas and tends to linger and stay low to the ground. Something extremely dangerous when it is being released next to a canyon which can trap and contain it further and where many people live. I should also add there are many families with young kids in this canyon. This lingering, flammable gas should NOT be released near a high fire danger zone. There is only one road in and out of this canyon and if a fire was to start (from the proposed plant or other fire sources) and spread due to the release of the methane gas from the proposed plant, it can cause a major catastrophe and loss of many lives and properties.

L56-2

L56-3 Please do not move forward with this project and look into cleaning the landfill gas to renewable natural gas at an alternate location.

Thank you in advance for listening to my concerns.

Respectfully,
Elan Borenstein

L57

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L57-1 OUR CONCERN IS FOR THE VISABILITY OF THE PLANT AND THE TRAFFIC ASSOCIATED WITH THE OPERATION AND MAINTENANCE OF THE FACILITY.

L57-2 FURTHER, THE POTENTIAL HEALTH HAZARDS TO THE RESIDENTS OF THE CANYON AND RESULTING PROBABLE LAW SUITS AGAINST THE CITY.

Thank you.

Sincerely,

GARY & CHERYL HANNAH
2601 PERKINS CIRCLE
GLENDALE, 91206

recd. Sept 10, 2020

Mr Gary L Hannah
2601 Perkins Cir
Glendale, CA 91206



Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California ~~91026-4386~~ 91206

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L58

L58-1 We have lived in Glenoaks Canyon for 46 yrs. and would like to enjoy our neighborhood during our senior years without further negative impact from the landfill.

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L58-2 As a 30-yr. initiator and volunteer of our Disaster Preparedness Program, I am greatly concerned about an increase in fire danger (especially the oil storage tanks) and the danger of fire originating on the landfill facility. The idea of evacuating the facility personnel down Glenoaks Blvd (the only exit for the inhabitants of 750 homes in the canyon) is ludicrous! An earthquake on the fault in the

L58-3 canyon could cause numerous problems for the facility and leak hazardous materials into the landfill. Methane is highly flammable and

L58-4 has no place so close to a residential area with an Elementary School (Glenoaks). Increased

L58-5 pollution, noise and negative impact on nature are just some additional problems.

For those of us who have had to watch the face of the landfill growing to the size of

L58-6 a dam that overpowers the views in our canyon, the addition of a power plant is truly the last straw — enough already!

Thank you.

Sincerely,

Isabelle H. Heyer
606 Haverkamp Dr.
Glendale, CA 91206

Rec'd Sept. 10, 2020

Isabelle Meyer
606 Haverkamp Dr.
Glendale, CA 91206-3117

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Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

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L59

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L59-1 ① The proposed Biogas Plant would be too close to residents in Glenoaks Canyon, only ½ mile from the nearest house.

L59-2 ② It would be processing methane, a highly explosive gas, to produce electricity in a very high fire zone. We had 2 fires in the Glenoaks canyon just last Saturday!

L59-3 ③ our family and neighbors are extremely concerned about air pollution the increase of cancer risk and about the noise of the plant expected to run 24/7. Our quiet Canyon is full of wildlife including bobcats, mountain lions, deer, coyotes, smaller animals and so many birds, the noise and pollution on our surrounding open space would be a disaster.

L59-4 ④ This plant would be located only ½ mile from the Verdugo Hills fault which has the potential to cause a large and expected earthquake of 6.7+ magnitude.

L59-5 ⑤ The Environmental Impact Report says the landfill will reach capacity in 2030, why bring a plant here with so few years left. The landfill is already over due to close. Grayson is a far better option for a location.

Thank you.

L59-6 ⑥ Alternative 2, cleaning landfill gas to Renewable Natural Gas is a better choice for residents with minimal air pollution and less health hazards.

Sincerely,

Jamie Kellum

Concerned Glenoaks Resident, Mother of 2 children

Rec'd Sept. 10, 2020

SANTA CLARITA CA 913

4 SEP 2020 PM 5 L



Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

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L60

September 6, 2020

Dear Mr. Krause

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill.

L60-1

- **Safety of the community**: Fire risk – the Glendale canyons are a high risk for fires. Building a biogas plant in this are raises unnecessary risks to the safety of area residents, as well as the larger community. Earthquake risk – the canyon is at risk for earthquakes. Building a biogas plant at the site of a landfill at the top of a mountain could damage the plant, causing fire, and air quality risks.

L60-2

- **Health risks**: Air pollution - air quality will be at risk due to the proposed plant. We already have unhealthy air quality days due to smog and adding plant exhaust. Noise pollution – the sound of the plant will be audible to people and wildlife. Fire and earthquake risks are exacerbated by the presence of a biogas plant in Scholl Canyon.

L60-3

- **Quality of life impact:** Construction of the plant will create noise that is disruptive to the community. The added risks noted above will cause stress and worry for nearby residents who will be constantly at risk of a disaster or incident. The noise and odor will have a negative effect on nearby residents.

L60-4

- **Wildlife and environmental impact:** Construction and operation of the plant will disrupt and harm protected wildlife and plant species in the area. Construction of the plant will disturb the stability of the land, irrigation and drainage.

L60-5

We strongly oppose construction of the biogas plant at the Scholl Canyon landfill.

Thank you and sincerely,

John & Carolyn Weiner
2237 Hollister Ter
Glendale CA

Recd. Sept. 10, 2020

L61

Mr Eric Krause,

L61-1 My name is Larry Moorehouse, retired Supt of Grayson Power Plant. It was me who convinced the city to fully shut down the power plant and flares at the older land fill and pipe the gas over to the newer land fill to be burned in the flares. Some of my questions are being ask as a result of the failure of the first power plant on the old landfill.

L61-2 1. How will the new plant be designed to burn the landfill gas that will not damage the new diesel engine generators that is being proposed.

L61-3 2. Will there be full time personnel at the new plant overseeing the safe operation, around the clock?

L61-4 3. Because the city has no employees that understands large diesel operations and maintenance, how are they planning to operate and maintain the new plant?

L61-5 4. Has the city received permission to build this plant?

L61-6 5. How will the city handle any and all waste from this plant?

L61-7 6. Are the engines going to be fully enclosed in a building, with an overhead crane for maintenance of the engines?

L61-8 7. Who will maintain the engines?

L61-9 8. Are there going to be enough engines to have at least one down for maintenance and still fully use all of the LF gas.

L61-10 9. What percent of LF gas and natural gas will the engines burn.

L61-11 10. How will the gas line going to Grayson be safely shut down?

L61-12 11. Who will handle all of the AQMD requirement and reporting?

Thank you,

Larry Moorehouse, 1137 N. central ave. apt. 1317, 818 241 8410

LM 9-5-20

Recd. Sept. 10, 2020

L62

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

Sir,

L62-1 We are greatly concerned about your Biogas project because of the potential air pollution and increase cancer risk.

L62-2 I personally has some medical issues and the potential noise and pollution could be detrimental to my and other people's health.

L62-3 Please consider ~~~~ moving the project to a suitable place.

Thank you.

Sincerely,

MAX & Lucille Denuna
2631 Sleepy Hollow Place
Glendale, CA 91206

Recd. Sept. 10, 2020

Place Stamp here

Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

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L63

From: Valerie D.
To: Krause, Erik
Subject: EIR Biogas Project Proposal
Date: Thursday, September 10, 2020 11:48:56 AM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Hi Erik Krause,

Thank you in advance for reading my comments regarding the EIR Biogas Project proposal.

After having done a lot of research, here are my primary concerns:

L63-1 - The current landfill is not up to EPA standards - it is in a high fire and earthquake zone and is in too close proximity to neighborhoods. That's bad in and of itself but I understand cities need landfills.
But - to then further industrialize the area feels *extremely unsafe* and *unethical* when the earthquake and fire conditions are *what they are*...and there's only one way out of Glenoaks Canyon. The implications of this are ultimately terrifying for me on a worst case scenario basis.

L63-2 - The landfill also doesn't have a lining under it, so how will the water also be protected from possible contamination? - this is a legitimate concern as well.

L63-3 - I hear the pollution levels will exceed safe standards and there seem to be no plans in the proposal to mitigate this.

L63-4 - I understand methane will be released for years to come and some plan of action needs to be in effect to convert this into renewable energy - but I ask that the City of Glendale looks into alternatives, specifically in updating the Grayson plant (renovating the pipeline) - or to identify another safe option altogether.

L63-5 - I also understand the landfill will be at capacity in 8-10 years and was planned to be closed. I support this and do not believe the area should be further industrialized.

L63-6 - Also, since flaring is currently being used to remove the excess methane, I encourage the City of Glendale to use new flares to improve air quality levels.

Thank you for your time and thank you for reading,
Valerie

L64

From: Shackeh Mastian
To: Krause, Erik
Subject: Question for DEIR
Date: Friday, September 11, 2020 12:24:57 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Hi Mr Krause,

I was asked to review the DEIR and attached is a question for DEIR.

Thanks
Shackeh Mastian

Questions for DEIR

L64-1 Although very small amount, but the removal of Carbonyl sulfide, Carbon disulfide and Mercaptan should be addressed , and if it is not removed the engine manufacturer should be able to have a report of exhaust gas composition including the burning of those in the engine.

L65

From: bbc castillo-Cifuentes
To: Krause, Eric
Cc: Ramirez, Raul; Sarkissian, Ara; Stevens, Daniel; Swerdzewski, Johnathan; Weidman, Jessica
Subject: Opposition to Scholl Canyon Biogas Plant DEIR
Date: Monday, September 19, 2022 2:26:44 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

TO: Mr. Eric Krause ekrause@glendaleca.gov

CC: Glendale City Council Members
CityCouncil@GlendaleCa.gov; MayorWang@GlendaleCa.gov; AKasparian@GlendaleCa.gov; dbrotman@glendaleca.gov; magarian@glendaleca.gov

Re: Opposition to Scholl Canyon Biogas Plant DEIR -- NO HILLSIDE POWER PLANT IN GLENDALE!

L65-1

My name is Bethsaida (Betsy) Castillo-Cifuentes. My family and I have lived in Glenoaks Canyon since 1974, over 45 years. We own 3 houses in the Canyon. My sister and I attended all Glendale local public schools--Glenoaks Elementary, Wilson Jr. High, and Glendale High School. We are heavily invested in this community. When we were young, we always played at Glenoaks Park and rode our bikes through the Canyon and always felt safe. We currently walk in the neighborhood regularly for exercise. We love smelling the fresh air and seeing neighbors walk, run, and bike in the Canyon. We also regularly frequent the Glenoaks Canyon Scholl golf course and tennis courts.

Background: Glendale Water & Power (GWP) wants to build a 12-megawatt power plant on the Scholl Canyon Landfill to turn landfill gas into electricity. The draft Environmental Impact Report for the project (DEIR) claims that the proposed "Project would not result in any significant and unavoidable environmental impacts." GWP proposes only minor mitigation measures in the areas of biological resources and wildfire. For decades the landfill gas had been sent via a pipeline to the Grayson Power Plant and turned into electricity there. In April 2016, the City of Glendale stopped this process, claiming that pollution near Grayson exceeded acceptable levels due to the old Grayson equipment. Since that time, the landfill gas has been burned, or "flared," at Scholl. There are many serious and dangerous impacts to the surrounding neighborhoods.

The Landfill Needs to Shut Down! The City must look at the proposed projects holistically. For example, ***the landfill was legally required to be closed in 1987 per the Joint Power Agreement but it has stayed open***. A few years ago, the City proposed to expand and/or extend the landfill and those proposals are hanging out there unresolved. There is excess capacity at the landfill that Glendale ***sells to other cities for a profit***. The Scholl Canyon residents don't feel this is fair since the environmental burdens are suffered most by them. The residents want to avoid putting a project at Scholl that would enable the landfill to continue in perpetuity since it is already long past its original expiration date.

General Concerns:

- * GWP must evaluate what fire mitigation is needed now, when the landfill gas is being flared 100% of the time.
- * The City of Glendale needs to look immediately into new flares to improve air quality. Flares will be used as backup for the proposed project and for all alternatives.
- * The Scholl Canyon Landfill area is surrounded by residential and recreation areas and should not be further industrialized. We are particularly concerned about the aesthetics, air quality, biological impacts, water contamination, noise, and fire danger of this proposed project in an earthquake-prone area.
- * GWP should perform an impartial and quantitative discussion of all of the alternatives. More details are needed in particular on Alternative 2, which contemplates cleaning up the gas to renewable natural gas (RNG) standards and delivering it to the gas company. Alternatively, the cleaned up RNG could generate electricity at Grayson or be used in fuel cells or other options. At least some of the gas cleanup could occur at Grayson.
- * A single combined EIR for Grayson and Scholl, discussing energy needs, renewable portfolio, and landfill gas utilization, needs to be done. Grayson and Scholl are completely connected, both physically, by the landfill gas pipeline, and also by the fact that both sites are parts of Glendale's overall electricity production and renewable portfolio. At least two of the alternatives rely on using Grayson facilities.
- * GWP needs to assure the public that nothing that is done with the landfill gas will affect the current closure criteria for the landfill. It should not be rezoned as industrial, and a Conditional Use Permit (CUP) should not be granted.
- * GWP needs to show the impact of the proposed project on the site after the landfill closes, since the proposed project is likely to continue to function 10 or more years past the closure date of the landfill, because landfill gas will continue to be emitted.
- * ***Property values will plummet*** in Glenoaks Canyon. Like Porter Ranch, here a public service is located in a very close proximity to a huge residential area. Methane gas can leak from a garbage dump causing serious potential hazards and resulting in huge liability to the City if something goes terribly wrong. This would be personally devastating for us.

Major Issues with the DEIR:

Air Quality: Pollution from the project will exceed the South Coast Air Quality Management District's (SCQAMD) thresholds for four contaminants, but the DEIR does not discuss either mitigation or using the best available control technology (BACT). Instead, the DEIR assumes that GWP will get priority reserve credits to eliminate the pollutants on paper. Measurements of the pollutants are made from monitors that are not near the landfill. The DEIR also ignores carcinogenic pollutants such as dioxins and furans.

Geology and Soils: The project will be located atop a mountain that sits near a potential 6.7 earthquake fault. Seismic waves on a mountain can be amplified 4 or 5 times those of field waves, and the report both gives insufficient mitigation measures for threats to power equipment, buildings, tanks, and pipelines and fails to present emergency back-up systems to mitigate damage from earthquakes or fire.

L65-2

Wildfire: Wildfire is a huge risk to Glenoaks and Chevy Chase Canyons, Linda Vista, and Eagle Rock due to its location in a designated very high fire zone. These neighborhoods have mostly narrow, single-access roads. The wildfire plan minimizes the danger and carelessly assumes that an on-site water tank and a fire department more than 5 miles away are sufficient.

- Recently, ***many Glenoaks Canyon residents have received fire insurance cancellation notices because of the extreme fire risk*** that already exists due to climate change and other factors. ***Putting a power plant on the hillside will make matters dramatically worse and create a catastrophic risk to life and property.***

- ***Have we not learned the hard lessons from largest gas leak in American history at Aliso Canyon?*** The Aliso Canyon massive leak caused thousands of local residents to have headaches, nausea, skin rashes, and severe nosebleeds. Over 1,000 residents had to be relocated resulting in over 1,000 lawsuits plus criminal charges. The Aliso Canyon gas leak cost Southern California Gas Co. over ***$1 billion in costs***. Here, that enormous liability would be borne by the City of Glendale and its residents since the power plant would be owned by the City and not a private company. These gas facilities should never be put in the middle of a residential area *especially* in such a high fire risk zone like Glenoaks Canyon.

Project Details: Many significant details are missing, including views of the project as proposed and as it will look when the landfill closes. How will the project impact the intended future recreation use of the site? What are the current landfill gas constituents and gas flow rate? Why were these engines chosen instead of other alternatives such as turbines?

Aesthetics: The 60,000-gallon water tank and the 40-foot tall engines will be visible from surrounding residential neighborhoods and will likely be visible from trails when the area reverts to a recreation area.

Biological Resources: The potential biological impact does not address key species. In addition, these hills serve as a wildlife corridor that could be disrupted by the project.

Energy: Although the project will utilize the energy that is currently being flared, there may be alternatives that can use the gas with less impact on the environment.

Greenhouse Gas (GHG) Emissions: The GHG numbers for the proposed project in Section 4.6 are inconsistent with the numbers in Appendix F. The numbers from Appendix F and the baseline flare numbers from Section 4.6 show that the GHG emissions may increase more than the significance threshold of 10,000 metric tons of carbon dioxide equivalent per year. It is altogether unclear where the proposed project numbers in Section 4.6 come from.

Hazards and Hazardous Materials: Hazards need to include the effect of earthquakes and fire on the hazards listed, such as the lube oil and waste oil tanks, and the natural gas line.

Hydrology and Water Quality: The landfill is unlined; therefore, the proposed project must ensure that oil and other contaminants are contained to protect the groundwater. In addition, more groundwater monitoring needs to be done to assure no release and migration of hazardous materials.

Land Use & Planning: The landfill and its closed sections operate under a Variance to the Special Recreation zoning use that applies to the entire area. Residential zones encircle the facility. These zoning designations reflect the long-held intent that the entire area would revert to recreational uses once the landfill is closed. It will likely reach its fill limit within 10 years. The project requires a Conditional Use Permit, which would open the door to further industrialization. Residents in the surrounding areas strongly oppose this change.

Noise: The chosen engines put out sound in very low frequencies 24/7. The analysis chart only goes down to 31.5 Hz, while humans can hear down to 20 (and can feel below that). Coupled with the difficulty the terrain makes for analysis, this could be harmful to both humans and animals.

Transportation: The report underestimates the project's impact on transportation by not including increased traffic during construction on Glenoaks Blvd. and by not addressing Colorado Blvd., especially near Figueroa, at all.

Utilities and Service Systems: This section needs a full discussion of the natural gas line and why it is not underground. *Also, how will this 12-megawatt facility interconnect to the electric grid?* This is a major missing piece.

Alternatives: GWP picked the proposed project without a detailed study of the alternatives and then backed into making them less attractive than the proposed project. An impartial and quantitative discussion of the alternatives is needed, particularly Alternative 2, which cleans up the gas to renewable natural gas (RNG) standards and injects it into the gas company's pipeline. Some vendors consider Alternative 2 an environmentally friendly and double option, although it may require upgrading the landfill gas collection system. Distributing the gas cleaning processes between Scholl and Grayson should also be explored.

Conclusion: ***We request that the landfill be closed as soon as possible and in the meantime that it be used only for Glendale residents*** and specifically Glenoaks Canyon residents. By doing this, the City will delay having to look for an alternate site for Glendale's own trash disposal needs at unknown costs in the future. We want to put this off for future generations and avoid being in the same position we are now. ***Please stop letting other cities use the site for monetary compensation***. The environment and our health take precedence over any amount of money.

There are over 2,000 residents in the Canyon, and we all currently enjoy the physical beauty of the surrounding environment. Glenoaks Canyon is truly a special place. We really don't want it to change.

Thank you for your attention to this important matter.

Sincerely,

Bethsaida (Betsy) Castillo-Cifuentes
2519 Hollister Terrace
Glendale CA 91206

L66

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L66-1 It would be less than a mile from my home, and would be a fire hazard.

L66-2 I also worry about the air pollution.

Thank you.

Sincerely, Claudia F. Sysock

Sept. 14, 2010

SANTA CLARITA CA 913

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Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

91206-431128

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L67

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L67-1 The Biogas plant would be processing methane, a highly explosive gas, to produce electricity in a very high fire zone. Just last week there was a fire caused by a spontaneous combustion of heat at the dump. This Biogas project is too close to residents in Glenoaks Canyon and 1/2 mile from the nearest home. There is cancer risks involved and would increase air pollution.

L67-2

L67-3 We say NO to the proposed Biogas Plant. It should be located at Grayson and the land fill gas should be piped there as in the Past.

L67-4 NO to the proposed Biogas Plant. People First !!

Thank you.

Sincerely,

Gina McNeese

Sept 14, 2020

SANTA CLARITA CA 913

10 SEP 2020 PM 6 L



STATIO

ENEVINS
431 Coutin Lane
Glendale CA 91206

Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

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L68

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

I have quite a few concerns about the proposed Biogas Project.

L68-1 (1) It would be processing methane (a highly exposive gas) in a very high fire zone.

L68-2 (2) It would be too close to residents in Glenoaks Canyon (only 1/2 mile from the nearest hoose).

L68-3 (3) The EIP says the landfill will reach capacity in 2030, why bring a plant here now with so few years left?

Thank you.

Sincerely,

Sept 14, 2020

The Ferrari Family
255 Sleepy Hollow Terrace
Glendale, CA 91206

SANTA CLARITA CA 913
10 SEP 2020 PM 1 L



Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

91206-431128

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L69

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L69-1 (1) The proposed project will have a negative affect on property values in Glenoaks canyon and surrounding areas.

L69-2 (2) Also, it would be too close to those of us living here as it would be only ½ mile from the nearest home in the canyon.

L69-3 (3) Another concern is that the proposed project would be only ½ mile from the Verdugo Hills Fault which has the potential to cause a 6.7 magnitude earthquake.

L69-4 (4) Finally, the Environmental Impact Report says the landfill will reach capacity in 2030. Why bring a power plant here now with so few years left in the landfill? It should be located at Grayson and the landfill gas should be piped there as in the past.

Thank you.

Sincerely,

Flora Cossio

3350 E. Glenoaks

Sept. 14, 2020

Place
Stamp
here

Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

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L70

From:	Frances Coburn
To:	Krause, Erik
Cc:	Agajanian, Vrej; Devine, Paula; Najarian, Ara; Kassakhian, Ardashes; Brotman, Daniel
Subject:	Comment on Draft Environment Impact Report for the Biogas Project
Date:	Monday, September 14, 2020 4:26:47 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Krause,

L70-1 I am a relatively newcomer to your community and I have been impressed with the natural beauty of Glendale and its setting in this ring of mountain ranges. There has been much care and guidance by the city leadership and community over more than one hundred years to have mostly maintained strict zoning and development. Thanks to you and the generations who preceded you.

It is therefore of great concern that Glendale Water and Power is seeking approval for an extensive industrial power plan to utilize the Scholl landfill gases in an area that is not zoned for such industrial purposes nor appropriate in such a populated community.

L70-2 The current Covid19 pandemic has made most everyone aware of the vitally important role the lungs and breathing plays in our health and life itself. Also, almost daily we read or have heard reports of the George Floyd death after being deprived of oxygen for less than ten minutes. Most recently, it is the extensive and out of control west coast wildfires that are also similarly causing death due to suffocation.

L70-3 Although the projected power plant does not deprive the area's citizens of air to breathe, it is more contaminated and less beneficial because of the increased pollutants that will be in it and particularly for compromised individuals who already suffer from asthma or the many other chronic lung diseases. That Glendale Water and Power can bypass this environmental pollution by "trading credits" does nothing to alter the ill effects it will have on the many residents that will be breathing the pollutants with their health and longevity compromised.

L70-4 Please give serious consideration to the negative aspects of this proposal and consider an alternative that would have less lasting ill effect on the residents and the future of our world's rapidly changing environment. Every member of society must do its part to protect the health of citizens as well as stabilize our climate

L70-4 and resources for future generations.

Most Sincerely,

Frances F. Coburn, PhD

L71

September 11, 2020

Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

Dr. Mr. Krause,

L71-1 My husband and I have been Glenoaks Canyon residents for 23 years. I am writing to you today with our comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill.

As long-time members of the canyon, we vehemently disagree with the proposed Biogas Plant for the following reasons:

L71-2 1) It would increase the risk of cancer. I am a breast cancer survivor and this plant is way too close to my home.
L71-3 2) It would be running 24 hours a day/7days a week – causing noise and air pollution.
L71-4 3) The plant would be processing methane which is a highly explosive gas in a high fire zone area. I can't even get fire insurance, except for CA Fair Plan.
L71-5 4) It is a geological hazard. It would be located only ½ mile away from the Verdugo Hills Fault which has the potential to cause a 6.7 magnitude earthquake.
L71-6 5) The 60,000 Gallon water tank and 40 Foot engines on the primary ridge would be visible to the homeowners and all of Eagle Rock. A real eyesore.

L71-7 Mr. Krause, we are asking that the Planning Commission and City Council reject a zoning change for this area and do a full study of our preferred alternative. The homeowners would prefer that you turn gas into renewable natural gas for the gas company. This will yield less pollution and would only require an adjustment to how the gas is collected. Risking human life is never the right choice. Please consider using the existing pipeline from Scholl Landfill to Grayson and add a new connector to the gas company pipeline. Lastly, please keep the commitment to close the landfill and honor the plans that had been presented for this area.

Sincerely,

Monica Lago-Kaytis

Monica Lago-Kaytis
437 Devonshire Ln.
Glendale, CA 91206

Sept. 14, 2020

L72

From:	Mauricio Cifuentes
To:	Krause, Erik
Cc:	Agajanian, Vrej; Devine, Paula; Kassakhian, Ardashes; Brotman, Daniel; Najarian, Ara; Mauricio Cifuentes
Subject:	Opposition to Scholl Canyon Biogas Plant DEIR -- NO HILLSIDE POWER PLANT IN GLENDALE!
Date:	Monday, September 14, 2020 10:03:09 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Greetings,

L72-1 My name is Omar Mauricio Cifuentes. I have been a resident of Glenoaks Canyon for 12 years, and my wife's family has lived in Glenoaks Canyon for over 45 years. One of my favorite aspects of the Canyon is the beautiful and quiet setting, which is close to nature and is in a safe and healthy environment.

L72-2 **Background**: Glendale Water & Power (GWP) wants to build a 12-megawatt power plant on the Scholl Canyon Landfill to turn landfill gas into electricity. The draft Environmental Impact Report for the project (DEIR) claims that the proposed "Project would not r esult in any significant and unavoidable environmental impa cts." GWP proposes only minor mitigation measures in the are as of biological resources and wildfire. For decades the lan dfill gas had been sent via a pipeline to the Grayson Power Plant and turned into electricity there. In April 2016, the City of Glendale stopped this process, claiming that pollution near Grayson e xceeded acceptable levels due to the old Grayson equipment. Sin ce that time, the landfill gas has been burned, or "flared," at Scholl. There are many serious and dangerous impacts to the surrounding neighborhoods.

L72-3 **The Landfill Needs to Shut Down**! The City must look at the proposed projects holistically. For example, ***the landfill was legally required to be closed in 1987 per the Joint Power Agreement but it has stayed open***. A few years ago, the City proposed to expand and/or extend the landfill and those proposals are hanging out there unresolved. There is excess capacity at the landfill that Glendale ***sells to other cities for a profit***. The Scholl Canyon residents don't feel this is fair since the environmental burdens are suffered most by them. The residents want to avoid putting a project at Scholl that would enable the landfill to continue in perpetuity since it is already long past its original expiration date.

General Concerns:

L72-4 * GWP must evaluate what fire mitigation is needed *now*, when the landfill gas is being flared 100% of the time.

L72-5 * The City of Glendale needs to look immediately into new flares to improve air quality. Flares will be used as backup for the proposed project and for all alternatives.

L72-6 * The Scholl Canyon Landfill area is surrounded by residential and recreation areas and should not be further industrialized. We are particularly concerned about the aesthetics, air quality, biological impacts, water contamination, noise, and fire danger of this proposed project in an earthquake-prone area.

L72-7 * GWP should perform an impartial and quantitative discussion of all of the alternatives. More details are needed in particular on Alternative 2, which contemplates cleaning up the gas to renewable natural gas (RNG) standards and delivering it to the gas company. Alternatively, the cleaned up RNG could generate electricity at Grayson or be used in fuel cells or other options. At least some of the gas cleanup could occur at Grayson.

L72-8 * A single combined EIR for Grayson and Scholl, discussing energy needs, renewable portfolio, and landfill gas utilization, needs to be done. Grayson and Scholl are completely connected, both physically, by the landfill gas pipeline, and also by the fact that both sites are parts of Glendale's overall electricity production and renewable portfolio. At least two of the alternatives rely on using Grayson facilities.

L72-9 *
GWP needs to assure the public that nothing that is done with the landfill gas will affect the current closure criteria for the landfill. It should not be rezoned as industrial, and a Conditional Use Permit (CUP) should not be granted.

L72-10 * GWP needs to show the impact of the proposed project on the site after the landfill closes, since the proposed project is likely to continue to function 10 or more years past the closure date of the landfill, because landfill gas will continue to be emitted.

L72-11 **** Property values will plummet*** in Glenoaks Canyon. Like Porter Ranch, here a public service is located in a very close proximity to a huge residential area. Methane gas can leak from a garbage dump causing serious potential hazards and resulting in huge liability to the City if something goes terribly wrong. This

L72-11 would be personally devastating for us.

Major Issues with the DEIR:

L72-12 **Air Quality**: Pollution from the project will exceed the South Coast Air Quality Management District's (SCQAMD) thresholds for four contaminants, but the DEIR does not discuss either mitigation or using the best available control technology (BACT). Instead, the DEIR assumes that GWP will get priority reserve credits to eliminate the pollutants *on paper*. Measurements of the pollutants are made from monitors that are not near the landfill. The DEIR also ignores carcinogenic pollutants such as dioxins and furans.

L72-13 **Geology and Soils**: The project will be located atop a mountain that sits near a potential 6.7 earthquake fault. Seismic waves on a mountain can be amplified 4 or 5 times those of field waves, and the report both gives insufficient mitigation measures for threats to power equipment, buildings, tanks, and pipelines and fails to present emergency back-up systems to mitigate damage from earthquakes or fire.

L72-14 **Wildfire:** Wildfire is a huge risk to Glenoaks and Chevy Chase Canyons, Linda Vista, and Eagle Rock due to its location in a designated very high fire zone. These neighborhoods have mostly narrow, single-access roads. The wildfire plan minimizes the danger and carelessly assumes that an on-site water tank and a fire department more than 5 miles away are sufficient.

L72-15
- Recently, ***many Glenoaks Canyon residents (including myself) have received fire insurance cancellation notices because of the extreme fire risk*** that already exists due to climate change and other factors. ***Putting a power plant on the hillside will make matters dramatically worse and create a catastrophic risk to life and property***.

L72-16

- ***Have we not learned the hard lessons from largest gas leak in American history at Aliso Canyon?*** The Aliso Canyon massive leak caused thousands of local residents to have headaches, nausea, skin rashes, and severe nosebleeds. Over 1,000 residents had to be relocated resulting in over 1,000 lawsuits plus criminal charges. The Aliso Canyon gas leak cost Southern California Gas Co. over ***$1 billion in costs***. Here, that enormous liability would be borne by the City of Glendale and its residents since the power plant would be owned by the City and not a private company. These gas facilities should never be put in the middle of a residential area *especially* in such a high fire risk zone like Glenoaks Canyon.

L72-17

Project Details: Many significant details are missing, including views of the project as proposed and as it will look when the landfill closes. How will the project impact the intended future recreation use of the site? What are the current landfill gas constituents and gas flow rate? Why were these engines chosen instead of other alternatives such as turbines?

L72-18

Aesthetics: The 60,000-gallon water tank and the 40-foot tall engines will be visible from surrounding residential neighborhoods and will likely be visible from trails when the area reverts to a recreation area.

L72-19

Biological Resources: The potential biological impact does not address key species. In addition, these hills serve as a wildlife corridor that could be disrupted by the project.

L72-20

Energy: Although the project will utilize the energy that is currently being flared, there may be alternatives that can use the gas with less impact on the environment.

L72-21

Greenhouse Gas (GHG) Emissions: The GHG numbers for the proposed project in Section 4.6 are inconsistent with the numbers in Appendix F. The numbers from Appendix F and the baseline flare numbers from Section 4.6 show that the GHG emissions may increase more than the significance thre

L72-21 shold of 10,000 metric tons of carbon dioxide equivalent per year. It is altogether unclear where the proposed project numbers in Section 4.6 come from.

L72-22 **Hazards and Hazardous Materials:** Hazards need to include the effect of earthquakes and fire on the hazards listed, such as the lube oil and waste oil tanks, and the natural gas line.

L72-23 **Hydrology and Water Quality:** The landfill is unlined; therefore, the proposed project must ensure that oil and other contaminants are contained to protect the groundwater. In addition, more groundwater monitoring needs to be done to assure no release and migration of hazardous materials.

L72-24 **Land Use & Planning:** The landfill and its closed sections operate under a Variance to the Special Recreation zoning use that applies to the entire area. Residential zones encircle the facility. These zoning designations reflect the long-held intent that the entire area would revert to recreational uses once the landfill is closed. It will likely reach its fill limit within 10 years. The project requires a Conditional Use Permit, which would open the door to further industrialization. Residents in the surrounding areas strongly oppose this change.

L72-25 **Noise:** The chosen engines put out sound in very low frequencies 24/7. The analysis chart only goes down to 31.5 Hz, while humans can hear down to 20 (and can feel below that). Coupled with the difficulty the terrain makes for analysis, this could be harmful to both humans and animals.

L72-26 **Transportation:** The report underestimates the project's impact on transportation by not including increased traffic during construction on Glenoaks Blvd. and by not addressing Colorado Blvd., especially near Figueroa, at all.

L72-27 **Utilities and Service Systems:** This section needs a full discussion of the natural gas line and why it is not underground. *Also, how will this 12-megawatt facility interconnect to the electric grid*? This is a major missing piece.

L72-28

<u>Alternatives</u>: GWP picked the proposed project without a detailed study of the alternatives and then backed into making them less attra ctive than the proposed project. An impartial and quantitative discussion of the alternatives is needed, particularly Alternative 2, which cleans up the gas to renewable natural gas (RNG) standards and inje cts it into the gas company's pipeline. Some vendors conside r Alternative 2 an environmentally friendly and doable option, although it may require upgrading the landfill gas collection system. Distributing the gas cleaning processes between Scholl and G rayson should also be explored.

L72-29

<u>Conclusion</u>: ***We request that the landfill be closed as soon as possible and in the meantime that it be used only for Glendale residents*** and specifically Glenoaks Canyon residents. By doing this, the City will delay having to look for an alternate site for Glendale's own trash disposal needs at unknown costs in the future. We want to put this off for future generations and avoid being in the same position we are now. ***Please stop letting other cities use the site for monetary compensation***. The environment and our health take precedence over any amount of money.

There are over 2,000 residents in the Canyon, and we all currently enjoy the physical beauty of the surrounding environment. Glenoaks Canyon is truly a special place. We really don't want it to change.

Thank you for your attention to this important matter.

Sincerely,

Omar Mauricio Cifuentes

2215 E. Glenoaks Blvd.

Glendale CA 91206

--
Cheers,

Mauri-CEO

L73

From: Dora Herrera
To: Krause, Erik
Subject: Scholl Canyon Landfill Power Plant
Date: Wednesday, September 16, 2020 8:47:00 AM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Krause,

L73-1 I'm writing this email to inform you that, as a Glendale resident, I oppose the building of a power plant at the top of the mountain. This proposed project will negatively affect the families living not only in Glendale, but also Eagle Rock, And Pasadena.These families that are called "sensitive receptors" in the project are human beings. Let's move on to the 22nd

L73-2 century, and use renewable fuels.

Thank you.

Dora Herrera

Dora Herrera
Yuca's Restaurants

L74

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant proposed at the Scholl Canyon Landfill:

L74-1 What is the point of this?

1. L74-2 There is already a methane gas line that is paid for and runs to the Grayson Power Plant. It makes no sense to me that you would want to abandon that line and build something entirely new up on the landfill.
2. L74-3 If you want a Biogas Plant why wouldn't it be sited at Grayson that has always been the site of power generation?
3. L74-4 Currently the site at Scholl Canyon Landfill has no connections to the electrical grid. It is a significant additional expense which would not be incurred at Grayson which is already part of the grid. In addition power lines running from the site are additional visual pollution for the surrounding neighborhoods.
4. L74-5 The initial agreement for the future of the landfill once completed, is to convert it into a recreational facility. Is it appropriate to have a power generation facility in the middle of a recreation facility? I don't think so.
5. L74-6 All of the unnecessary expenses for siting the plant at the landfill would become an additional tax burden on the citizens of Glendale. Given the already uncertain future of the economy it makes no sense to increase the tax burden which would further depress the economy in Glendale.

L74-7 Once again what is the real point of this? On many counts it makes no sense.

Thank you.

Sincerely,

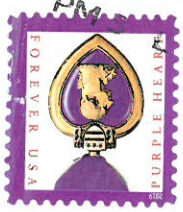
Nancy Wise

16 Sept. 2020

14 SEP 2020

913

PM



Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91206-4386

91206-431193

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STATION

L75

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

"I have the following concerns/comments about the proposed Biogas Project:"

L75-1 L75-9 1. It would be too close to residents in Glenoaks Canyon, only 1/2 mile from the nearest house.

L75-2 2. It would be processing methane, a highly explosive gas, to produce electricity in a very high fire zone.

L75-3 3. It would increase air pollution.

L75-4 4. It would increase cancer risk.

L75-5 5. It would be running 24 hours a day/ seven days a week and would be noisy.

L75-6 6. It would be located only 1/2 mile from the Verdugo Hills Fault which has the potential to cause a 6.7 magnitude earthquake.

L75-7 7. It would have a 60,000 gallon water tank and 40 foot engines on a primary ridge line, visible in the Eagle Rock area.

L75-8 8. The Environmental Impact Report says the landfill will reach capacity in 2030, why bring a plant here now with so few years left in the landfill? It should be located at Grayson and the landfill gas should be piped there as in the past.

9. Alternative 2, cleaning landfill gas to Renewable Natural Gas, would be a better choice for nearby residents as it would have minimal air pollution and less

von. Gerry's passions were intense and followed him throughout

Thank you.

Sincerely,

Rafael Hernandez



Mr Rafael Hernandez
535 Arch Pl
Glendale, CA 91206

SANTA CLARITA CA 913
16 SEP 2020 PM 5 L



Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

91206-431128

fold

fold

L76

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant proposed at the Scholl Canyon Landfill:

L76-1 What is the point of this?

1. L76-2 There is already a methane gas line that is paid for and runs to the Grayson Power Plant. It makes no sense to me that you would want to abandon that line and build something entirely new up on the landfill.
2. L76-3 If you want a Biogas Plant why wouldn't it be sited at Grayson that has always been the site of power generation?
3. L76-4 Currently the site at Scholl Canyon Landfill has no connections to the electrical grid. It is a significant additional expense which would not be incurred at Grayson which is already part of the grid. In addition power lines running from the site are additional visual pollution for the surrounding neighborhoods.
4. L76-5 The initial agreement for the future of the landfill once completed, is to convert it into a recreational facility. Is it appropriate to have a power generation facility in the middle of a recreation facility? I don't think so.
5. L76-6 All of the unnecessary expenses for siting the plant at the landfill would become an additional tax burden on the citizens of Glendale. Given the already uncertain future of the economy it makes no sense to increase the tax burden which would further depress the economy in Glendale.

L76-7 Once again what is the real point of this? On many counts it makes no sense.

Thank you.

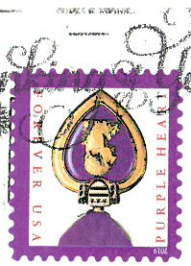
Sincerely,

Randall Wise

Randall Wise

16 Sept 2020

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14 SEP 2020 PM 4 L



STATION

Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

91206-431128

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L77

From: Richard Espinosa
To: Krause, Erik; akassaskhian@glendaleca.gov; Brotman, Daniel; Najarian, Ara
Subject: Biogas Project
Date: Wednesday, September 16, 2020 7:44:15 PM
Attachments: Biogas Project.docx

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Attached are my comments regarding the Biogas Project. Thank you for your attention to this matter.
Sincerely,
Richard Espinosa

September 16, 2020

Dear Mr. Krause,

I would like the following comments to be submitted to The Biogas Project. Thank you for your help with this.

As a longtime resident of Glenoaks Canyon, I strongly believe that the city needs to look at an alternative site for this project. Of all of the alternatives being considered, I believe Alternative 2 offers the best option for the general welfare of the residents of Glendale and its neighboring areas.

L77-1

For too long the City of Glendale has made unfulfilled promises to the residents of Glenoaks Canyon regarding the present landfill located in this area. Many unknown risks and health factors had not been forthcoming from the city or have been properly investigated further and shared. It is time for the city to finally unburden the residents of Glenoaks Canyon with the continual use of the present landfill and its hazards. That is why I am in favor of Alternative 2.

L78

Dear Mr. Krause,

Sept. 10, 2020

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L78-1 I am a long time resident of Glendale in Glenoaks Canyon and live on the eastern part of Hellister Terrace close to the landfill. Understandably I am OPPOSED to installation of the proposed Biogas Project at the landfill. Locate the proposed Project at Grayson and pipe the landfill gas to Grayson as in the past. My opposition is based on:

L78-2 • Some Glenoaks Canyon residents live only a half mile from the landfill.

L78-3 • There is a distinct possibility of increased noise pollution, air pollution causing health issues for Glendale residents.

• As you know, the Verdugo Hill Fault line is located only half a mile from the landfill and has the potential to cause a 6.7 magnitude earthquake.

L78-4 • Installation of a 60,000 gallon water tank and 40 foot engines on a primary ridge line would be highly visible and create an eyesore to Glendale. I care about the aesthetics of our city.

L78-5 alternative 2, cleaning landfill gas to renewable natural gas would be a better choice for our city.

Thank you. Your decisions are ones with long range implications for the health and well being of Glendale residents.

Sincerely,

Shirley Woo

16 Sept. 2020

ARITA CA 913
20 PM 5 L



Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California ~~91026-4386~~ 91206

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L79

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L79-1 It would be too close to residents in Glenoaks Canyon, only ½ mile to the nearest house.

L79-2 It would be processing methane to produce electricity in a very high fire zone.

L79-3 Increased air pollution

L79-4 Increased cancer risk.

L79-5 Increased noise pollution

L79-6 It would be located ½ mile from an earthquake fault.

L79-7 The Landfill will reach capacity in 2030.

Sept. 17, 2020

Thank you.

Sincerely, Cindy Swenson - Resident of Glenoaks Canyon since 2011

Steve + Cindy Swenson
2600 Hollister Ter
Glendale, CA 91206-3119

SANTA CLARITA CA 913
15 SEP 2020 PM 4 L



Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

91205-431128

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L80

From: Michael Mallory
To: Krause, Erik
Subject: Scholl Canyon Biogas Plant DEIR
Date: Saturday, September 19, 2020 7:47:05 AM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Krause and Glendale City Council:

L80-1 For the past two years, I have been active within the Glenoaks Canyon movement to pressure the city council to do what was promised years and years ago, which is to cap the Scholl Canyon Landfill rather than expand it to dangerous levels. Now you are proposing to build a power plant on it, which is even more dangerous. Those of us who live here think capturing the natural gas and transporting it to the Grayson plant is a much better, cheaper, and safer way to proceed.

L80-2 Glenoaks Canyon, while lovely, has increasingly become a precarious place to live, due to wildfires: those that occur due to traffic mishaps on the 134 Freeway, and those set deliberately by the moron offspring of the president of the Eagle Rock Chamber of Commerce. A fire has already occurred in the landfill. A power plant built on top of a landfill will only make life in the canyon more precarious due to any number of further accidents and/or natural disasters that could potentially occur, including an earthquake (the big brother of the one we had last night). Glenoaks Canyon is located within a perfect storm of fault lines. The major quake that is inevitable could seriously damage any structure sitting atop the landfill, potentially starting a major fire and sending toxic gasses into the air. Residents of the canyon would very likely be unable to escape since a high-magnitude quake could also seal off the canyon, which has only one road in and out.

L80-3 You may argue that I am dealing in hypotheticals. The 4.6-magnitude quake that shook my house at 11:30 last night was not hypothetical. The 2012 fire at the landfill is not hypothetical. The practice of burning off excess methane (I call them “Zurn Burns”) resulting in a caul of toxic, fetid air settling over the canyon is not hypothetical, particularly to the children and seniors who can’t go outside during those times. You can also continue to argue how much money the city will make by expanding the landfill and its operation, and hide behind the various fudged and skewed ecological studies and reports the city has bought and paid for to support its position. I cannot read you chapter-and-verse as to why this is an ecological disaster as well as the genuine scientists and ecologists who live in this area. I encourage you to read all of their letters before you have the next Aliso Canyon on your hands.

L80-4 I will, however, make a prediction: building anything on top of a dump will take far more time and far more money than anyone is anticipating, and result in one problem after another. Why am I convinced of this? Because I have lived in Glenoaks Canyon for 24 years, and I have heard projects announced, promised, and propagandized that are either altered or never come into existence at all, despite millions of dollars spent. Or else they take twice the promised time (the Central Library remodel, anyone?). To put it bluntly, why should we believe the city could safely and competently build a power plant on time and budget when it can’t even get an Armenian heritage museum off the ground?…in *Glendale.*

L80-5 Please end this boondoggle for once and for all. Capture the gas and send it to Grayson, and

L80-5 cap over the landfill, as was once promised.

Sincerely,

Michael Mallory
2317 Blackmore Drive
Glendale, CA 91206

L81

For the project

Sept 8, 2020

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L81-1 Please BUILD IT AS PLANNED! Do not let a vocal minority of obstructionist constituents dissuade the city from proceeding.

L81-2 The landfill will produce methane for some time, whether this biogas project is built or not. AQMD requires that this gas be dealt with. What better way to deal with a waste byproduct than to use it as a free energy source?

L81-3 The proposed site is far enough away from canyon residences that it will be almost unnoticed and unheard. The ridgeline is hardly pristine now being the result of landfill operations for the last several decades.

Sept. 21, 2020

Thank you.

Sincerely,

Richard Schmittdiel
schmitrw@earthlink.net

Place
Stamp
here

Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

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L82

From: Joan Morris
To: Krause, Erik
Cc: Agajanian, Vrej; Najarian, Ara; Devine, Paula; Kassakhian, Ardashes; Brotman, Daniel
Subject: Public Comment for Biogas Renewable Generation Project, Scholl Canyon Landfill
Date: Tuesday, September 22, 2020 9:49:26 AM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Krause,

L82-1 Thank you for this opportunity to submit my comment on the proposed Biogas Renewable Generation Project at the Scholl Canyon Landfill. My comments will cover my concerns about aesthetics, fire, air pollution and support of Alternative 2, cleaning Landfill Gas to Renewable Natural Gas.

AESTHETICS

In reading the Draft Environmental Impact Report, I have the following concerns/comments:

- 4.1.1.1 Scenic Vistas and Ridgelines

L82-3 As noted in the DEIR, "…the San Rafael Hills are the most significant physical landmark in the community because these topographical features flank the central portion of the city. These landforms are important in that they create a dominant visual and physical resource that can be seen throughout the community…(T)he adjacent ridgeline south of the existing LFG collection facility and flares as well as proposed FG power generation facility is in a designated primary ridgeline. …(T)he proposed water tank would be located on the primary ridgeline."
Comment: Although there are no scenic vistas that would be impacted, the fact that the proposed 60,000-gallon water tank would be located on a primary ridgeline would mar the view of the ridgeline in Eagle Rock and adjoining areas. Per the definition of "Intactness" in the Environmental Impact Analysis on p. 4-14, "intactness is measure of the visual integrity of the natural and human-built landscape and its freedom from encroaching elements." A view of a 60,000-gallon water tank on top of a primary ridgeline would be an "unattractive feature" and would "detract from the quality of the view."

- 4.1.1.2 Land use: Comment: The proposed Biogas Power Plant should not be built on land that has been zoned residential/recreational. It should be built in an area zoned industrial, M3, such as along the San Fernando Corridor. Alternative 2 which is proposed to be built at the Grayson Power Plant, in the M3 zone, would be an appropriately zoned, thus preferable, setting for this project.

L82-4

- 2.0 Project Description: "At its current fill rate, the SCLF is estimated to reach its fill capacity by 2030." Comment: What will happen to the landfill after it reaches its fill capacity by 2030? CEQA Review requires including an analysis of the environmental effects of future expansion or other action if "(1) it is a reasonably foreseeable consequence to the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects." Laurel Heights

L82-5

L82-5 Improvement Assn. v. Regents of Univ. of Cal. (1988) 47 Cal. 3d 396

- Comments: Accordingly, when the landfill reaches its fill capacity, will the landfill be expanded, or will it be closed and converted into a recreational area? The residents in Glendale, Eagle Rock and Pasadena should be informed in this DEIR of the future of the landfill to fully evaluate the cumulative impacts of the Aesthetic portion of the EIR. For example, if the landfill will be closing in 2030 and turned into a recreational area as has long been assumed/promised:
    - As mentioned in 4.14 "Recreational groups are likely to be highly sensitive to visual changes, as they typically regard the natural and built surroundings as a holistic visual experience." Not knowing if the landfill will become a recreational area in 2030 when it reaches capacity makes it impossible to fully evaluate this DEIR. This project has been presented as if it will be an active landfill throughout the lifespan of the Biogas Project, until approximately 2040, but that is simply not the case.

L82-6
    - would the proposed project be visible from new vista points that are part of the recreational area? Would the proposed project be visible to car or foot traffic entering/exploring the area?
    - Would the proposed project, consistent with an industrial structure (4.1.4), be appropriate in a recreational setting?
    - Would light and glare have an impact on an area that would become a recreational setting?
    - The proposed LFG power generation facility would be placed just north of a designated primary ridgeline (4.1.1.1). Since the landfill may become a recreational area after 2030, would this use of the land violate Goal 2 or 5 of C4.1.2.3 of the City of Glendale Municipal Code to "protect ridgelines …from the negative impacts of development and urbanization?"

L82-7
    - Because the landfill will reach its fill capacity before reaching the estimated life of the Biogas Project (20 years), shouldn't an alternative project away from the landfill be considered (at Grayson) instead?
- 4.1.4 Project Impacts

L82-8
- 4.1.4: As mentioned above, the proposed water tank on the primary ridgeline will affect the vistas in Eagle Rock and surrounding areas. Comment: Could they be placed in a more inconspicuous area, away from public view?

L82-9
- 4.1.4: Comment: Can the lighting be placed on motion detector timers so they would be off most of the time and not cause unnecessary glare?

L82-10
- 4.1.4: Comment: Noise greatly affects the aesthetics of an area and a discussion of the proposed project's noise levels should be described in this section.

L82-11
- 4.1.1. Views 1, 2, 3, 4: The four photos submitted are the ones that were submitted from the MND and are dated 2-22-2016. Comments: Have the vistas changed since then? Has the project become visible due to changing foliage and/or landfill configuration?

L82-12
- 4.1.4 Project Impacts during Demolition (pp. 4.26-4.29): Comment: As the landfill will be reaching its fill levels by 2030, it is important to understand the future of the landfill after that date. If the landfill is to be converted into a recreational area, creating a project with an "industrial appearance" seems at odds with an area designated for recreational use. Will excavation of earth be taken from the primary ridgeline which would forever mar the aesthetic beauty of the area, especially if used by recreational users? It is impossible to

L82-12 assess the aesthetic impact of this project adequately as the future of the landfill that would take place after capacity is reached are unknown.

- 4.31-4.36: Comment: Line of Sight Analysis figures are too small to read. In addition, it is exceedingly difficult for the lay reader of this DEIR to ascertain the meaning of this analysis. Workshops should be held to educate the public as to how to read this graphic. It would be far easier if a 3-D image were created which would show the placement of the 40 foot exhaust stacks and flare, the 25 foot equipment height as well as the 12 foot office and warehouse height in order to determine if any of this equipment would be visible for Eagle Rock or adjoining areas. Importantly, components of the project are described to be industrial in nature, which differs from the hillside views that Eagle Rock residents currently see when looking at the landfill from the south. It is stated that "the SCLF is excluded from the Rim of the Valley Corridor Preservation Act." However, if the landfill is closed in 2030 and turned into a recreational area, it is very conceivable that this area could then be included in the Rim of the Valley Corridor Act, and it is important to consider this fact when evaluating the Aesthetic portion of this EIR. Therefore, not knowing the future nature of the landfill prohibits the public from making an informed assessment.

L82-13

L82-14 4.1.5 Cumulative Impacts: The stated conclusion, "The proposed Project would not degrade the existing visual character of quality of the site and its surrounding areas" cannot be made with such certainty as the DEIR does not state what will happen to the landfill after it reaches capacity in 2030. The visual character and quality of the site and its surrounding areas may very well be degraded if the landfill becomes a recreational area after closure.

FIRE

Table 51 identifies Regional Fire History of the area

Comment: This history understates the impact of recent fires in the area. It does not mention the fire that burned in Aug. 2019 only 2 miles from the site of the proposed Biogas Project. If the fire had continued down the north side of the 134 freeway, an area of native chaparral, it could have easily swept into the area of the Proposed Biogas Project and ignited it. Moreover, in this time of climate change, Santa Ana winds are not needed to have fires rage out of control. For example, 2020 Bobcat fire, at the time of this comment, has been burning with very little containment for seven days and

L82-15 as of this writing, and the Santa Ana wind condition has not been present. The fact that fires in California are "worsened by climate change, which not only makes temperatures hotter but is blamed by some scientists for causing dry periods to get drier while wet periods get wetter, making vegetation even more ripe for kindling." (Los Angeles Times, "Extreme Weather Stoked Wildfires," p. 1). The DEIR has not considered the full impact of climate change in putting this project in a designated very high fire zone. Sadly, mitigation measures do not work during these times of climate change. What does work is careful planning by city leaders to not jeopardize community welfare by placing projects, such as the Biogas Project, in an inappropriate setting. Placing the Biogas Project in a very high fire zone is an inappropriate setting in this day and age.

AIR QUALITY

L82-16 Comment: The air quality in Glendale is already compromised. The air quality index in Glendale is

L82-16

45% worse than the national average. The pollution index in Glendale is 2653% worse than the national average. https://www.areavibes.com/glendale-ca/weather/ Emissions from the Proposed Biogas Power Plant would far exceed allowable thresholds of commonly used criteria pollutants. For example, nitrogen dioxide, carbon monoxide, volatile organic compounds and the larger particulate matter would all exceed what is allowable by the South Coast Air Quality Management District. These pollutants cause harm to the central nervous system, lung function, cellular function, the immune system, the reproductive system, and brain development in young children. Glendale Water and Power would use priority reserve credits to eliminate these pollutants on paper, but the reality is, these dangerous and toxic contaminants would be further polluting our already polluted air. No mitigation measures are identified in the DEIR to offset this dangerous pollution. I suggest the following mitigation measure take place: Air filtration systems should be installed in every home and business within a two mile radius of the landfill as a remedy to protect the health and welfare of those living or working in close proximity to the proposed Biogas Power Plant.

L82-17

Flares: The DEIR states in Section 1.2.3 on page 1.2 that the "South Coast Air Quality Management District additionally passed new regulations in January 2019 that requires landfills that do not convert 80% or more of LFG to beneficial use to replace the existing LFG flares with new flares that comply with more stringent NOX and VOC emissions." Because there are thousands of people living and working within two miles of the Scholl Canyon Landfill, for the health of residents, the City of Glendale should install the new flares immediately to improve air quality. We have already lived with the flaring of landfill gas since April, 2018, and, depending what happens with the certification of this DEIR, we may have several more years of flaring ahead of us. Also, please consider that use of the proposed Biogas Project puts all living/working near the landfill at greater risk than the flares themselves. Per comments made by Dr. Amir Dejbakhsh, Assistant Deputy Executive Officer of Engineering and Permitting at the South Coast Air Quality Management District, at an AB 2588 Public Meeting held at the Glendale Central Library on June 26, 2019, "Now with the flares you know they run at a much, much higher temperature than what you see at an exhaust from a boiler or from generating a gas turbine so the chances of seeing cancer risk from a flare is typically much, much lower than a boiler or a gas turbine." https://www.youtube.com/watch?v=dCrKzeFYJOo
Comment: The public is at a much greater risk with the proposed boilers than with flaring the landfill gas. Because we may be faced with a process that puts us at much greater risk in the future, all consideration should be given to providing the flares that would have least BOX and VOC emissions available in the meanwhile.

ALTERNATIVE 2

L82-18

Comment: Residents of Glenoaks Canyon, Eagle Rock, Pasadena and other neighborhoods are very familiar with the hazards of the proposed Biogas Project, some of which I named above and many of which I did not cover such as being located only ½ mile from the Verdugo Earthquake Fault, such as the noise pollution from a project that would be running 24 hours a day/seven days a week only a mile or two from hundreds of nearby homes and residents as well as pollution from increased truck traffic to the proposed site. Because many raised their concerns about this project at the public hearing for the Mitigated Negative Declaration with the Planning Commission, on March 21, 2018, the Planning Commission ruled that this project undergo a full Environmental Review so that alternatives to the project could be evaluated. Although alternatives to the Biogas Project were only briefly and incompletely presented, there is one that would be superior to the proposed project,

L82-18

Alternative 2. Alternative 2 would clean landfill gas to renewable natural gas and would be a much better option for nearby residents as it would be environmentally friendly, would have minimal air pollution and less health hazards. This option could be located partially or fully at Grayson Power Plant and would minimize the danger of having an industrial unit in a very high fire zone. This option should be fully explored by Glendale Water and Power and should be promoted by city officials as a better option for the people of Glendale and in neighboring cities.

Conclusion

L82-19

The Draft Environmental Impact Report on the Biogas Power Plant does little to assuage residents living and working nearby that building the proposed Biogas Power Plant would do anything to increase the betterment of their health and safety in the community. Rather, in reading the DEIR, they learn that their air would be further polluted without mitigation, they would face further danger should a fire take place in the area and the aesthetic beauty of the beautiful natural environment of the San Rafael Hills would be threatened and compromised. However, an Alternative has been identified, Alternative 2, that would be far less threatening to the community's health and welfare. I implore all decision makers to take a second look at this promising and viable alternative. Alternative 2 would be much better for the community as it is environmentally friendly, would have minimal air pollution and less health hazards. Meanwhile, the flares currently in use at Scholl Canyon Landfill should be updated to the most current standards.

Best regards,

Joan Morris
Board Member
Glenoaks Canyon Homeowners Association
35-year Resident, Glenoaks Canyon

L83

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L83-1

"I have the following concerns/comments about the proposed Biogas Project:"

1. **It would be too close to residents in Glenoaks Canyon, only 1/2 mile from the nearest house.**
2. **It would be processing methane, a highly explosive gas, to produce electricity in a very high fire zone.**
3. **It would increase air pollution.**
4. **It would increase cancer risk.**
5. **It would be running 24 hours a day/ seven days a week and would be noisy.**
6. **It would be located only 1/2 mile from the Verdugo Hills Fault which has the potential to cause a 6.7 magnitude earthquake.**
7. **It would have a 60,000 gallon water tank and 40 foot engines on a primary ridge line, visible in the Eagle Rock area.**
8. **The Environmental Impact Report says the landfill will reach capacity in 2030, why bring a plant here now with so few years left in the landfill? It should be located at Grayson and the landfill gas should be piped there as in the past.**
9. **Alternative 2, cleaning landfill gas to Renewable Natural Gas, would be a better choice for nearby residents as it would have minimal air pollution and less health hazards.**

L83-2

L83-3

L83-4

L83-5

L83-6

L83-7

L83-8

Thank you.

L83-9

Sincerely,

Amaly Avakian

AMALY AVAKIAN

Sept. 23, 2020

↑ All of the above!

Amaly A. Avakian
2665 Sleepy Hollow Pl.
Glendale, CA 91206-4716

SANTA CLARITA CA 913
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Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

91206-4311 28

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L84

From: Marla Nelson
To: Krause, Erik
Cc: Daniel Brotman; Kassakhian, Ardashes; Devine, Paula; Najarian, Ara; Agajanian, Vrej
Subject: Public Response Letter from CSLA RE: Scholl Canyon Biogas Project
Date: Wednesday, September 23, 2020 1:28:45 PM
Attachments: CSLA DEIR letter.pdf

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Mr. Krause,

Please see attached.

Thank you,
Marla Nelson

COALITION for SCHOLL LANDFILL ALTERNATIVES

September 22, 2020

Dear Erik Krause,

L84-1 I am writing on behalf of the Coalition for Scholl Landfill Alternatives, or CSLA, which is a group of Glendale, Eagle Rock and Pasadena residents who are concerned about the health and wellbeing of our communities, especially regarding the effects of Scholl Canyon Landfill upon the neighborhoods closest to the landfill. We oppose the industrialization of the landfill and favor the closure and cleanup of the landfill in the near future.

L84-2 CSLA would like to express some concerns about the DEIR that has been prepared in connection with the proposed power plant at Scholl. We ask that these concerns be carefully considered, because they are motivated by our deep commitment to ensuring the safety of our neighborhoods, both now and in the future. The historic wildfires that we have been witnessing make it clear that climate change is here and will exacerbate many of the issues that worry us the most as time passes.

L84-3 **Wildfire:** Wildfire is a huge risk to Glenoaks and Chevy Chase Canyons, as well as to the nearby Linda Vista and Eagle Rock neighborhoods. Any discussion of the future of the landfill, due to its location in a designated very high fire zone, must have fire prevention and safety at the forefront. These neighborhoods have mostly narrow, single-access roads. The wildfire plan minimizes the danger and carelessly assumes that an on-site water tank and a fire department more than five miles away are sufficient.

L84-4 **Air Quality:** We are also concerned about the unhealthy and dangerous emissions the plant will produce to pollute the air we breathe. There are cleaner solutions to burning the methane and we ask you to consider them.

Pollution from the project will exceed the South Coast Air Quality Management District (SCQAMD) thresholds for four contaminants, but

the DEIR does not discuss either mitigation or using the best available control technology (BACT). Instead, the DEIR assumes that GWP will get priority reserve credits to eliminate the pollutants on paper. Measurements of the pollutants are made from monitors that are not near the landfill.

L84-4

This is NOT a green project. The priority reserve credits that GWP hopes to receive make it green on paper, but it is NOT green for our lungs, our bodies, our children, or our neighborhoods.

The DEIR also ignores carcinogenic pollutants such as dioxins and furans.

Geology and Soils: The project will be located atop a mountain that sits near a potential 6.7 earthquake fault. Seismic waves on a mountain can be amplified to 4 or 5 times the strength of field waves, and the report both proposes insufficient mitigation measures for threats to power equipment, buildings, tanks, and pipelines and fails to present emergency back-up systems to mitigate damage from earthquakes or fire.

L84-5

We all got a wake-up call just before midnight on Friday, September 18. The earthquake was a relatively mild one, but it still shook vigorously and for a long time. How would the proposed power plant stand up to a quake directly beneath it? The DEIR doesn't even address that possibility.

Also, the Scholl biogas plant should not be analyzed separately from a holistic Glendale energy plan that includes Grayson Power Plant and the methane from Scholl.

L84-6

Taking all these matters into account, the DEIR for the proposed plant at Scholl Canyon has not taken into consideration any future closure plans for the landfill in relationship to the plant. Promises to close the landfill and return it to recreational use have been made and broken many times in the past. The landfill is now scheduled to close in 2028. Where, and what, is the plan for that?

L84-7

This highlights the fundamental problem, not only with the proposed power plant, but, more broadly, with the existence of a landfill, so close to our neighborhoods, unlined in parts, and in a high fire zone. A

L84-8

L84-8 replacement for the landfill needs to be identified, and plans need to be made for its cleanup and closure, NOW, rather than at some vague point in the future.

Sincerely,

Marla Nelson
Co-Founder of CSLA

Eileen Hatrick
CSLA Lead, Eagle Rock

L85

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L85-1 I live in Glendale Cyn, well within the ½ mile radius around the proposed Bio gas plant. a personal concern for us Canyonites is not only the air quality, but our home values. Who wants to live next to such a Contaminent?

L85-2 It would process Methane a highly explosive gas in a HIGH FIRE ZONE. Those of us who are losing our insurance coverage, can attest to that. Along with being in a High fire zone, its ½ mile away from the Verdugo Fault line.

L85-3 The land fill was built off fractured rocks already unstable, if a major earthquake hits.

L85-4 Considering a Bio gas project in the middle of so many residential homes is outrageous & unwise.

L85-5 We Glendale Canyonites already have concerns about our air, ground, water quality & what Methane gas being released into the air we breathe is doing to us? Please consider closing land fill gas-to renewable Natural gas or relocate this project back to Grayson. Thank you.

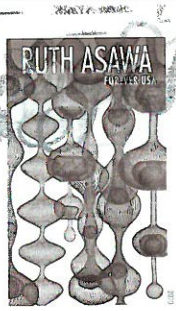
Thank you.

Sincerely,

Renée Holt
Hollister Terrace
2526
Glendale, CA 91206

2526 Hollister Terrace
Glendale CA 91206
Hoct

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23 SEP 2020 PM 1 L



STATION

Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

91206-4311 28

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L86

From: Sharon Primary
To: Krause, Erik
Subject: Biogas Project at Scholl
Date: Wednesday, September 23, 2020 4:09:42 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Erik Krause
Dear Sir,

L86-1 I have been a home owner and resident in Glenoaks Canyon for 47 years. I raised 4 children in this canyon and also was a teacher at Glenoaks Elementary School for 25 years. It has remained a somewhat serene canyon even with new homes being built through the years . Do not antagonize the residents of this canyon by proposing a project that has absolutely NO PLACE in a residential neighborhood ! For the good of the children and others a golf course and ballpark fields were added on landfill property years ago & then, somehow, the methane gas retrieval

L86-2 plant got added . For a box canyon (one way in & out) - many many people were appalled ! Over the years I've lived here we have been evacuated at least 5 times due to fires, and, " on watch & ready" a number of other times. I do NOT UNDERSTAND why a project (prone to more chances of Fire) would even be a consideration at this time.

L86-3 I have read the EIR and feel that, although it does not provide enough details about the alternatives to make reasonable comparisons - Alternative 2 appears to be the least intrusive into the lives of canyon residents . It definitely is superior to the other alternatives in air quality disruption, aesthetics, biological impacts, water

L86-4 contamination, and, most important (at THIS time!) threat of wildfire !!! A huge goal SHOULD BE : avoid burning gas in internal combustion engines or turbines at Scholl Canyon !!! Other major concerns that should be considered

L86-5 are noise, air quality threats, proximity to earthquake faults(have lived here for at least 5 notable " shakes!") & the ever present fire danger - with ONE WAY IN and ONLY ONE WAY OUT!

L86-6 I am truly hopeful that the city will analyze their findings and listen carefully to the legitimate concerns of canyon residents.

Scholl Canyon is NOT the location for this plant!!!

Sincerely,
Sharon McDonald
Canyon resident

Sent from my iPhone

L87

From: alice ryu
To: Krause, Erik
Subject: Resident opposition to Scholl Canyon Biogas Renewable Generation Project EIR
Date: Thursday, September 24, 2020 4:31:20 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Hello,

L87-1 I am a resident of Eagle Rock which is the residential neighborhood located just south of the Scholl Canyon Landfill and the one most directly impacted by the Landfill.

I am very concerned about the health impacts of the proposed BioGas Project to myself, my family (including young children and elderly parents) as well as my neighbors and community.

L87-2 As you know the Scholl Canyon Landfill is located near the borders between Glendale, Los Angeles, and Pasadena. Any valid environmental impact study must measure the potential impact on all stakeholders, not merely the ones within the border of the City of Glendale.

L87-3 I urge you to include the City of Los Angeles, particularly our District 14 representatives on the City Council in your decision-making.

Sincerely,
Alice Ryu

L88

2351 E. Glenoaks Blvd.
Glendale, CA 91206
Sept. 21, 2020

Erik Krause
Deputy Director of Community Development, City of Glendale
633 East Broadway, Room 103
Glendale, CA 91206

Dear Mr. Krause,

Thank you for this opportunity to submit my comment on the proposed Biogas Renewable Generation Project at the Scholl Canyon Landfill. My comments will cover my concerns about aesthetics, fire, air pollution and support of Alternative 2, cleaning Landfill Gas to Renewable Natural Gas.

L88-1

AESTHETICS

In reading the Draft Environmental Impact Report, I have the following concerns/comments:

- 4.1.1.1 Scenic Vistas and Ridgelines
  As noted in the DEIR, "...the San Rafael Hills are the most significant physical landmark in the community because these topographical features flank the central portion of the city. These landforms are important in that they create a dominant visual and physical resource that can be seen throughout the community...(T)he adjacent ridgeline south of the existing LFG collection facility and flares as well as proposed FG power generation facility is in a designated primary ridgeline. ...(T)he proposed water tank would be located on the primary ridgeline."
  Comment: Although there are no scenic vistas that would be impacted, the fact that the proposed 60,000-gallon water tank would be located on a primary ridgeline would mar the view of the ridgeline for in Eagle Rock and adjoining areas. Per the definition of "Intactness" in the Environmental Impact Analysis on p. 4-14, "intactness is measure of the visual integrity of the natural and human-built landscape and its freedom from encroaching elements." A view of a 60,000-gallon water tank on top of a primary ridgeline would be an "unattractive feature" and would "detract from the quality of the view."

- 4.1.1.2 Land use: Comment: The proposed Biogas Power Plant should not be built on land that has been zoned residential/recreational. It should be built in an area zoned industrial, M3, such as along the San Fernando Corridor. Alternative 2 which is proposed to be built at the Grayson Power Plant, in the M3 zone, would be an appropriately zoned, thus preferable, setting for this project.

- 2.0 Project Description: "At its current fill rate, the SCLF is estimated to reach its fill capacity by 2030." Comment: What will happen to the landfill after it reaches its fill capacity by 2030? CEQA Review requires including an analysis of the environmental effects of future expansion or other action if "(1) it is a reasonably foreseeable consequence to the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects." Laurel Heights Improvement Assn. v. Regents of Univ. of Cal. (1988) 47 Cal. 3d 396
- Comments: Accordingly, when the landfill reaches its fill capacity, will the landfill be expanded, or will it be closed and converted into a recreational area? The residents in Glendale, Eagle Rock

Sept. 24, 2021

and Pasadena should be informed in this DEIR of the future of the landfill to fully evaluate the cumulative impacts of the Aesthetic portion of the EIR. For example, if the landfill will be closing in 2030 and turned into a recreational area as has long been assumed/promised:

- As mentioned in 4.14 "Recreational groups are likely to be highly sensitive to visual changes, as they typically regard the natural and built surroundings as a holistic visual experience." Not knowing if the landfill will become a recreational area in 2030 when it reaches capacity makes it impossible to fully evaluate this DEIR. This project has been presented as if it will be an active landfill throughout the lifespan of the Biogas Project, until approximately 2040, but that is simply not the case.
- would the proposed project be visible from new vista points that are part of the recreational area? Would the proposed project be visible to car or foot traffic entering/exploring area?
- Would the proposed project, consistent with an industrial structure (4.1.4), be appropriate in a recreational setting?
- Would light and glare have an impact on an area that would become a recreational setting?
- The proposed LFG power generation facility would be placed just north of a designated primary ridgeline (4.1.1.1). Since the landfill may become a recreational area after 2030, would this use of the land violate Goal 2 or 5 of C4.1.2.3 of the City of Glendale Municipal Code to "protect ridgelines ...from the negative impacts of development and urbanization?"
- Because the landfill will reach its fill capacity before reaching the estimated life of the Biogas Project (20 years), shouldn't an alternative project away from the landfill be considered (at Grayson) instead?

- 4.1.4 Project Impacts
- 4.1.4: As mentioned above, the proposed water tank on the primary ridgeline will affect the vistas in Eagle Rock and surrounding areas. Comment: Could they be placed in a more inconspicuous area, away from public view?
- 4.1.4: Comment: Can the lighting be placed on motion detector timers so they would be off most of the time and not cause unnecessary glare?
- 4.1.4: Comment: Noise greatly affects the aesthetics of an area and a discussion of the proposed project's noise levels should be described in this section.
- 4.1.1. Views 1, 2, 3, 4: The four photos submitted are the ones that were submitted from the MND and are dated 2-22-2016. Comments: Have the vistas changed since then? Has the project become visible due to changing foliage and/or landfill configuration?
- 4.1.4 Project Impacts during Demolition (pp. 4.26-4.29): Comment: As the landfill will be reaching its fill levels by 2030, it is important to understand the future of the landfill after that date. If the landfill is to be converted into a recreational area, creating a project with an "industrial appearance" seems at odds with an area designated for recreational area. Will excavation of earth be taken from the primary ridgeline which would forever mar the aesthetic beauty of the area, especially if used by recreational users? It is impossible to assess the aesthetic impact of this project adequately as the future of the landfill that would take place after capacity is reached are unknown.
- 4.31-4.36: Comment: Line of Sight Analysis figures are too small to read. In addition, it is exceedingly difficult for the lay reader of this DEIR to ascertain the meaning of this analysis. Workshops should be held to educate the public as to how to read this graphic. It would be far easier if a 3-D image were created which would show the placement of the 40 foot exhaust

stacks and flare, the 25 foot equipment height as well as the 12 foot office and warehouse height in order to determine if any of this equipment would be visible for Eagle Rock or adjoining areas. Importantly, components of the project are described to be industrial in nature, which differs from the hillside views that Eagle Rock residents currently see when looking at the landfill from the south. It is stated that "the SCLF is excluded from the Rim of the Valley Corridor Preservation Act." However, if the landfill is closed in 2030 and turned into a recreational area, it is very conceivable that this area could then be included in the Rim of the Valley Corridor Act, and it is important to consider this fact when evaluating the Aesthetic portion of this EIR. Therefore, not knowing the future nature of the landfill prohibits the public from making an informed assessment.

4.1.5 Cumulative Impacts: The stated conclusion, "The proposed Project would not degrade the existing visual character of quality of the site and its surrounding areas" cannot be made with such certainty as the DEIR does not state what will happen to the landfill after it reaches capacity in 2030. The visual character and quality of the site and its surrounding areas may very well be degraded if the landfill becomes a recreational area after closure.

FIRE

Table 51 identifies Regional Fire History of the area

Comment: This history understates the impact of recent fires in the area. It does not mention the fire that burned in Aug. 2019 only 2 miles from the site of the proposed Biogas Project. If the fire had continued down the north side of the 134 freeway, an area of native chaparal, it could have easily swept into the area of the Proposed Biogas Project and ignited it. Moreover, in this time of climate change, Santa Ana winds are not needed to have fires rage out of control. For example, 2020 Bobcat fire, at the time of this comment, has been burning with very little containment for seven days and as of this writing, and the Santa Ana wind condition has not been present. The fact that fires in California are "worsened by climate change, which not only makes temperatures hotter but is blamed by some scientists for causing dry periods to get drier while wet periods get wetter, making vegetation even more ripe for kindling." (Los Angeles Times, "Extreme Weather Stoked Wildfires," p. 1). The DEIR has not considered the full impact of climate change in putting this project in a designated very high fire zone. Sadly, mitigation measures do not work during these times of climate change. What does work is careful planning by city leaders to not jeopardize community welfare by placing projects, such as the Biogas Project, in an inappropriate setting. Placing the Biogas Project in a very high fire zone is an inappropriate setting in this day and age.

AIR QUALITY

Comment: The air quality in Glendale is already compromised. The air quality index in Glendale is 45% worse than the national average. The pollution index in Glendale is 2653% worse than the national average. https://www.areavibes.com/glendale-ca/weather/ Emissions from the Proposed Biogas Power Plant would far exceed allowable thresholds of commonly used criteria pollutants. For example, nitrogen dioxide, carbon monoxide, volatile organic compounds and the larger particulate matter would all exceed what is allowable by the South Coast Air Quality Management District. These pollutants cause harm to the central nervous system, lung function, cellular function, the immune system, the reproductive system, and brain development in young children. Glendale Water and Power would use priority reserve credits to eliminate these pollutants on paper, but the reality is, these dangerous and

toxic contaminants would be further polluting our already polluted air. No mitigation measures are identified in the DEIR to offset this dangerous pollution. I suggest the following mitigation measure take place: Air filtration systems should be installed in every home and business within a two mile radius of the landfill as a remedy to protect the health and welfare of those living or working in close proximity to the proposed Biogas Power Plant.

Flares: The DEIR states in Section 1.2.3 on page 1.2 that the "South Coast Air Quality Management District additionally passed new regulations in January 2019 that requires landfills that do not convert 80% or more of LFG to beneficial use to replace the existing LFG flares with new flares that comply with more stringent NOX and VOC emissions." Because there are thousands of people living and working within two miles of the Scholl Canyon Landfill, for the health of residents, the City of Glendale should install the new flares immediately to improve air quality. We have already lived with the flaring of landfill gas since April, 2018, and, depending what happens with the certification of this DEIR, we may have several more years of flaring ahead of us. Also, please consider that use of the proposed Biogas Project, puts all living/working near the landfill at greater risk than the flares themselves. Per comments made by Dr. Amir Dejbakhsh, Assistant Deputy Executive Officer of Engineering and Permitting at the South Coast Air Quality Management District, at an AB 2588 Public Meeting held at the Glendale Central Library on June 26, 2019, "Now with the flares you know they run at a much, much higher temperature than what you see at an exhaust from a boiler or from generating a gas turbine so the chances of seeing cancer risk from a flare is typically much, much lower than a boiler or a gas turbine."
https://www.youtube.com/watch?v=dCrKzeFYJOo
Comment: The public is at a much greater risk with the proposed boilers than with flaring the landfill gas. Because we may be faced with a process that puts us at much greater risk in the future, all consideration should be given to providing the flares that would have least BOX and VOC emissions available in the meanwhile.

ALTERNATIVE 2

Comment: Residents of Glenoaks Canyon, Eagle Rock, Pasadena and other neighborhoods are very familiar with the hazards of the proposed Biogas Project, some of which I named above and many of which I did not cover such as being located only ½ mile from the Verdugo Earthquake Fault, such as the noise pollution from a project that would be running 24 hours a day/seven days a week only a mile or two from hundreds of nearby homes and residents as well as pollution from increased truck traffic to the proposed site. Because many raised their concerns about this project at the public hearing for the Mitigated Negative Declaration with the Planning Commission, on March 21, 2018, the Planning Commission ruled that this project undergo a full Environmental Review so that alternatives to the project could be evaluated. Although alternatives to the Biogas Project were only briefly and incompletely presented, there is one that would be superior to the proposed project, Alternative 2. Alternative 2 would clean landfill gas to renewable natural gas and would be a much better option for nearby residents as it would be environmentally friendly, would have minimal air pollution and less health hazards. This option could be located partially or fully at Grayson Power Plant and would minimize the danger of having an industrial unit in a very high fire zone. This option should be fully explored by Glendale Water and Power and should be promoted by city officials as a better option for the people of Glendale and in neighboring cities.

Conclusion

The Draft Environmental Impact Report on the Biogas Power Plant does little to assuage residents living and working nearby that building the proposed Biogas Power Plant would do anything to increase the betterment of their health and safety in the community. Rather, in reading the DEIR, they learn that their air would be further polluted without mitigation, they would face further danger should a fire take place in the area and the aesthetic beauty of the beautiful natural environment of the San Rafael Hills would be threatened and compromised. However, an Alternative has been identified, Alternative 2, that would be far less threatening to the community's health and welfare. I implore all decision makers to take a second look at this promising and viable alternative. Alternative 2 would be much better for the community as it is environmentally friendly, would have minimal air pollution and less health hazards. Meanwhile, the flares currently in use at Scholl Canyon Landfill should be updated to the most current standards.

Best regards,

Joan Morris

Joan Morris
Board Member
Glenoaks Canyon Homeowners Association
35-year Resident, Glenoaks Canyon

L89

Linda Goodman Pillsbury

2528 Sleepy Hollow Drive
Glendale, CA 91206
818-522-3952; lindapillsbury@gmail.com

September 24, 2020

Erik Krause
Deputy Director of Community Development
City of Glendale
Community Development Department
633 East Broadway, Rm. 103
Glendale, CA 91026-4386

Dear Mr. Kraus,

L89-1 I would like to share my thoughts about the biogas plant proposed to be built at the Scholl Canyon Landfill. I live and work in Glendale, and there are many reasons why I think this is a bad idea, and I do not think the DEIR adequately addresses my concerns.

L89-2 FIRE: Wildfires are on everyone's mind right now. With the local Bobcat fire not yet contained after burning already for more than 2 weeks, we are all worried that there could be a similar fire here in Glendale. The proposed biogas site on the Scholl Canyon landfill is in a high fire zone, and would be only half a mile away from the nearest house. Glenoaks Canyon and Chevy Chase Canyons in Glendale and nearby neighborhoods in Pasadena (Linda Vista neighborhood) and Los Angeles (Eagle Rock) are at grave risk should there ever be a fire. These neighborhoods have mostly single-access roads making evacuation challenging. The wildfire plan does not adequately address these risks.

L89-3 AIR: The last few weeks of unhealthy air quality (mostly due to the Bobcat Fire), have reminded us all just how important clean air is. Even if there never were a fire at the proposed biogas plant, the plant itself will produce dangerous and unhealthy emissions, and I am very worried. Burning the methane is NOT the cleanest solution. Please consider existing superior technology. Although the proposed biogas project will cause pollution that exceeds the South Coast Air Quality Management District's thresholds, the DEIR does not address using the best available technology to clean the air. Instead, by focusing on credits that the GWP can get, the DEIR avoids the problem of actually making the air healthy. In other words the DEIR trades the health and safety of all the people living nearby, for paper credits (which do not clean the air). The DEIR also does not address the issue that the monitors measuring the pollutants are far from the site.

L89-4 EARTHQUAKES: Obviously, we can never be certain when an earthquake will happen, but the proposed project is very near a potential 6.7 seismic fault. An earthquake (which could be magnified by the geology of the mountain the site sits on) could cause massive damage to the project, including buildings, power equipment, tanks, pipelines. The DEIR needs to address what could happen in an earthquake, and how the damage might be contained.

L89-5 THE LANDFILL: Since the Scholl Canyon Landfill is scheduled to be closed in 8 years, in 2028, it seems to me that any plans for the site (which was promised to be recreational use), need to look at the big picture. How could the site be used for recreation with a noisy, polluting power plant on it?

L89-6 In summary, I believe that there are many very important issues (discussed above) that the DEIR does not adequately address, and it is also imperative that the biogas plant issues be considered along with the landfill issues. It seems to me that relying on a flawed DEIR to guide these very important decisions reflects on Glendale's leadership. From everything I have read and learned, I

L89-7 do not believe the biogas plant is safe; I do not believe it is the best way to address the overall issues; and the proposed plans do not help build the Glendale that we all want to live in.

L89-8 I urge you to fully explore better alternatives, particularly alternative 2, cleaning the landfill gas to renewable Natural Gas, and to make decisions based on the health and well-being of community members.

Sincerely,

Linda Goodman Pillsbury

L90

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L90-1 1. It would be too close to residents in Glenoaks Canyon, only 1/2 mile from the nearest house.

L90-2 2. It would be processing methane, a highly explosive gas, to produce electricity in a very high fire zone.

L90-3 3. It would increase air pollution.

L90-4 4. It would increase cancer risk.

L90-5 5. It would be running 24 hours a day/ seven days a week and would be noisy.

L90-6 6. It would be located only 1/2 mile from the Verdugo Hills Fault which has the potential to cause a 6.7 magnitude earthquake.

L90-7 7. It would have a 60,000 gallon water tank and 40 foot engines on a primary ridge line, visible in the Eagle Rock area.

L90-8 8. The Environmental Impact Report says the landfill will reach capacity in 2030, why bring a plant here now with so few years left in the landfill? It should be located at Grayson and the landfill gas should be piped there as in the past.

L90-9 9. Alternative 2, cleaning landfill gas to Renewable Natural Gas, would be a better choice for nearby residents as it would have minimal air pollution and less health hazards.

Thank you.

Sincerely,

Randel & Fuwena Abarro

R. Abarro
2408 Sleepy Hollow Dr.
Glendale, CA 91206

SANTA CLARITA CA 913
24 SEP 2020 PM 4 L



STATION

Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

91206-431128

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==========fold==========

L91

From: S Denlinger
To: Krause, Erik
Subject: Scholl Canyon Methane burning
Date: Thursday, September 24, 2020 11:46:44 AM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Krause,

L91-1 Disposing of the solid waste of a city as large as Glendale is a problem.

Complicating that problem by polluting the air of Eagle Rock, Glendale and Pasadena is not the answer.

L91-2 Please search for another solution.

L91-3 Please do not burn off methane gas into our air. The long-term damage to the lungs of residents, particularly the lungs of children, is not worth the ease of disposing of waste at Scholl Canyon.

Thank you,

Sylvia Denlinger
Resident
Eagle Rock, CA

L92

From: Virginia Melin
To: Krause, Erik
Cc: Stoney Sharp
Subject: The proposed 12 MW power-generating facility at the Scholl Canyon Landfill
Date: Thursday, September 24, 2020 10:20:20 AM

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Dear Mr. Krause,

L92-1 As an Eagle Rock resident with two young children, I agree with the GEC, who believes that the public and the city's decision makers need more information to decide the best way to deal with the biogas while ensuring that the health of the environment and local residents are protected to the greatest extent possible. While information about the environmental impacts has been provided for the proposed project, and four alternative projects are briefly discussed in the EIR, we would like to see information about additional possible alternatives and information allowing side-by-side comparisons of monetary costs and of environmental and health effects between the proposed project and the possible alternatives.

Sincerely,

Virginia L Melin
Colossal Youth
310.869.9858

www.thecolossalyouth.com

L93

From: William Fritz
To: Krause, Erik
Subject: Scholl Canyon Biogas Plant DEIR
Date: Friday, September 25, 2020 4:56:13 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Krause,

L93-1 I'm a long time resident of Glenoaks Canyon. My family and I have lived at 2666 E. Glenoaks Blvd for close to 20 years. I'm writing because I have grave concerns regarding the Biogas Project.

L93-2 My issues are numerous, and I'm sure you're hearing them from many members of the community - but they are real concerns. The plant would be too close to residents, producing methane that is highly explosive in a fire area. Just in the past few years, we've experienced two significant fires due to the potent combination of climate change and the ever dry conditions in the canyon. We do not need this added threat.

L93-3 Also, the fact that the plant would be located near the Verdugo Hills Fault is of major concern.

The danger this plant poses is real, and is something that will directly affect me and my family.

L93-4 Too many times it seems like city officials align with business because, I'm sure, that's where most of the money is generated, and I'm guessing there is plenty of money involved when it comes to this plant - but the decision to continue with the Scholl Canyon Biogas Plant has the greatest impact on the citizens of Glendale, the families…the taxpayers.

Regards, Bill Fritz

L94

From:	Paul Cobian
To:	Krause, Erik
Cc:	Enrique Zaldivar; Traci Minamide; Mas Dojiri; Hassan Rad; Tim McWilliams; Steve Martin; Jose Hernandez; Avak Keotahian; Paul Cobian
Subject:	Comments on the Draft Environmental Impact Report Prepared For The Biogas Renewable Generation Project at Scholl Canyon Landfill (SCH NO. 2017081062)
Date:	Friday, September 25, 2020 11:35:44 AM
Attachments:	COMMENT LETTER-DEIR For the Biogas Renewable Generation Project at Scholl Canyon Landfill (09252020).pdf

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Krause,

L94-1 On behalf of the City of Los Angeles, LA Sanitation & Environment (LASAN) submits the attached comments on the adequacy of the City's Draft Environmental Impact Report (DEIR) prepared for the Biogas Renewable Generation Project pursuant to the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.)

LASAN appreciates the opportunity to respond to this DEIR. Should you have any questions, please contact Hassan Rad, Division Manager of the Regulatory Affairs Division at
(213) 847-5186.

Thank You,
Paul S. Cobian
Environmental Supervisor II
LA Sanitation and Environment
Regulatory Affairs Division
Phone: 213-847-5182
Email: paul.cobian@lacity.org
Web: www.lacitysan.org

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September 25, 2020

ELECTRONIC & REGULAR MAIL

Mr. Erik Krause, Deputy Director of Community Development
City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, CA 91026-4386
ekrause@glendaleca.gov

Dear Mr. Krause:

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT PREPARED FOR THE BIOGAS RENEWABLE GENERATION PROJECT AT SCHOLL CANYON LANDFILL (SCH NO. 2017081062)

On behalf of the City of Los Angeles, LA Sanitation & Environment (LASAN) submits these comments on the adequacy of the City's Draft Environmental Impact Report (DEIR) prepared
L94-2 for the above-referenced project pursuant to the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.) Los Angeles supports the City of Glendale's goal to beneficially use the landfill gas generated at the Scholl Canyon Landfill. These comments are submitted on behalf of the City of Los Angeles and in the interests of those residents living within the Eagle Rock area who may be adversely affected by the environmental effects of the Project.

Major issues are presented first with a description of the issue, followed by the technical basis for the comment, and a proposed means to resolve the issue. The remaining issues are presented in table format.

BACKGROUND

L94-3 The Proposed Project would replace the existing practice of sending landfill gas to the Grayson Power Plant by pipeline for combustion with a new on-site power plant, which would produce approximately 12 megawatts of electricity by utilizing the naturally-occurring landfill gas as a

fuel source for electrical generating equipment. The new power plant would be located at the Scholl Canyon Landfill, an existing Class III nonhazardous landfill facility that accepts municipal solid waste and is not a generator of, or repository for, hazardous wastes. The landfill site occupies approximately 535 acres with portions owned by the City of Glendale, Los Angeles County, and Southern California Edison. The Proposed Project involves construction and operation of an approximately 2.2-acre power plant to be located on a portion of an approximately 95-acre site owned by Los Angeles County. The Project is located within the City of Glendale and is therefore subject to the City's land use and zoning designations.

L94-3

The City of Glendale previously hired a consultant to conduct an Initial Study (IS), and the subsequent environmental review required a Mitigated Negative Declaration (MND). However, the Glendale City Council directed staff to complete an Environmental Impact Report (EIR) for the Proposed Project, including a careful consideration of a range of reasonable alternatives.

One noteworthy change that occurred between completion of the IS/MND and release of the DEIR was a determination[1], by the Glendale Department of Water and Power, that the continued combustion of landfill gas at the Grayson Power Plant resulted in the release of cancer and non-cancer causing pollutants, which exceeded the applicable regulatory thresholds of significance, resulting in potential human health risks. The practice was therefore discontinued. The DEIR states that the plans to repower Grayson do not include burning landfill gas from the Scholl Canyon Landfill. As such, Scholl Canyon Landfill gas is currently being flared at the landfill.

MAJOR ISSUES

Issue 1- Health Risk Assessment: As a preliminary matter, the DEIR states that the nearest "Sensitive Receptor Area" (SRA) is at 752 S. Wilson Ave in Pasadena, which is approximately 6 miles away. (DEIR, p. 4.56). This appears inaccurate as the residents of the Eagle Rock community live just over the Ventura Freeway (Highway 134) from the Landfill, a fact that other sections of the DEIR recognize. (See Figure 4.1-2 [View of Site from Eagle Rock].) Please clarify the nearest identified sensitive receptor(s) used for preparation of the air quality and Health Risk Assessment in the DEIR. This should be the location of one or more specific sensitive receptor locations (e.g., a residence, school, congregate care facility, etc.), that is closest to the Project Site for use in the HRA modeling – not, as indicated in the DEIR, a larger "Sensitive Receptor Area."

L94-4

If one or more specific receptors were not identified and used in the modeling of the potential health effects of the Project, please explain the City's methodology. In practice, this would be a deviation from standard HRA modeling and would potentially understate the potential effects by spreading emissions over a larger area.

The human health risk assessment for toxic air emissions from the Scholl Canyon reciprocating internal combustion engines (RICE) unit appears to omit consideration of the five compounds (dioxins, furans, hexavalent chromium, arsenic, and nickel) that led to discontinuing the burning of the landfill gas at the Grayson Power Plant. Emissions of these polluting compounds are likely

L94-5

[1] http://www.aqmd.gov/docs/default-source/planning/risk-assessment/city-of-glendale-2015-hra-report.pdf

L94-5 to be higher at Scholl Canyon than they were at Grayson, where the practice was halted due to cancer and non-cancer health risk concerns.

Technical Basis for Issue: The City of Glendale, Glendale Water & Power prepared an *Air Toxics "Hot Spots" Program (AB2588) Health Risk Assessment Report, July 2018* (i.e., 2015 Approved Health Risk Assessment [HRA]). The risk assessment states that the cancer risks at the Point of Maximum Impact (PMI), Maximum Exposed Individual Resident (MEIR), and Maximum Exposed Individual Worker (MEIW) are 277,186, and 7 in one million, respectively. The report further states that dioxin and furan compounds account for approximately 80% of cancer risk, while hexavalent chromium accounts for approximately 8% of cancer risk and arsenic accounts for approximately 6% of cancer

L94-6 risk. These substances were attributed to the combustion of Scholl Canyon Landfill gas combustion in the boilers, which contributed 97% of the overall cancer risks calculated for the Grayson Power Plant. In addition, the study states that the assumed total emissions of arsenic, dioxin, and furan compounds, and nickel contribute approximately 98% of the non-cancer chronic hazard index (HIC) attributed to the facility.

The Grayson Power Plant subsequently conducted emissions testing in 2018 and used that data, which was approved by the South Coast Air Quality Management District (SCAQMD) for AB 2588 purposes to conduct an Alternate HRA. Although the subsequent HRA shows health risks may be lower than the 2015 Approved HRA, the calculated cancer risk at the MEIR would still exceed the SCAQMD Rule 1402 — Control of Toxic Air Contaminants from Existing Sources that applies to facilities that exceed specific risk thresholds (e.g., cancer risk greater than 25 in-one-million).

For these reasons, combustion of Scholl Canyon Landfill gas was discontinued at Grayson Power Plant and is not part of their upcoming repowering plans. Although the Scholl Canyon Landfill gas was a small percentage of all of the natural gas burned at Grayson Power Plant, five compounds from the landfill gas (dioxin, furans, hexavalent chrome, arsenic, and nickel) accounted for 97% of the excess cancer risks at Grayson Power Plant, and 98% of the non-cancer chronic health impacts.

The HRA presented in the DEIR, however, omits an assessment of the potential health risks associated with dioxin/furan emissions from the Scholl Canyon Landfill, and the Toxic Air Contaminants Emission Summary presented in the DEIR[2] does not include arsenic, hexavalent chrome, or nickel. That is, the five compounds that caused the preponderance of health risk at the Grayson Power Plant from burning landfill gas were apparently not included in the analysis supporting the EIR. Why is this?

The combustion engines and flares associated with the Proposed Project at Scholl Canyon Landfill would presumably result in emissions of the same toxic air contaminants as those determined to cause health risks greater than the applicable thresholds at the Grayson Power Plant as a result of combustion of the same Scholl Canyon Landfill gas. Although we were unable to review the model input files for the DEIR risk assessment,

[2] Table 19, page 4.99; Appendix B.4 Toxic Emission Inventory

L94-6 none of the information provided in the DEIR, including the appendices, reflects that the five key compounds described above were included in the risk assessment analysis.

Issue Resolution: The air quality impacts and associated health risks of the Proposed Project should be revised to reflect consideration of the reasonably foreseeable health effects of the proposed Project to the nearest sensitive receptor – namely, the residence that is located closest to the Project site in the Eagle Rock Community.

L94-7 The analysis should also be revised based on operating emissions using 100 percent landfill gas as the worst-case scenario, and should explicitly consider the human health risks (both cancer and non-cancer) posed by dioxins, furans, hexavalent chrome, arsenic, and nickel in the discharge plume from the new combustion units and the flares, including the health effects of any ROG or NOx, which may result from construction or operation of the proposed Project. (See *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 516.) The risk from combustion of landfill gas at Scholl Canyon Landfill should be directly compared to that at the Grayson Power Plant for disclosure of the potential impacts. If the cancer and non-cancer health risks exceed regulatory thresholds, alternate locations, or emission control devices should be identified along with all feasible mitigation measures. [3] (See also *Berkeley Keep Jets Over the Bay Committee v. Bd. of Port Commissioners* (2001) 91 Cal.App.4th 1344, 1365-1366, fn. 12 [finding EIR inadequate for airport expansion project because it relied on an outdated "speciation profile" to evaluate increases in TAC emissions; this omission, the court said, "is a serious one, and is such as to prevent a decision maker and the public from gaining a true understanding of one of the most important environmental consequences of [the project]."]) (*Id*. at pp. 1366–1367.)

L94-8 **Issue 2- Disclosure of Impacts:** Certain portions of the DEIR's impact analysis improperly relies on the City of Glendale Municipal Code exemptions for Utility Projects, contained in Title 16, to excuse its analysis of potentially significant adverse impacts under CEQA. Title 16; however, is inapplicable to the proposed Project; it was adopted for purposes of considering and approving subdivision developments, not projects such as the one at issue. (See Municipal Code, §16.04.020(A) ["The purpose of this title and any rules, regulations, standards, and specifications adopted pursuant thereto is to control and regulate *the division and subdivision of land* within the city and such land as may be annexed to the city . . ."].) There is no "division and subdivision of land" at issue here. The Subdivision Map Act, and the City's cited Municipal Code sections adopted to implement the Act (e.g., section 16.08.010(E)(G), do not trump the disclosure requirements of CEQA.

To provide context, section 16.08.010, subdivision (D), states: "Prohibitions. No grading, engineered slopes, housing construction, streets, utilities or other manmade features shall be permitted within identified primary ridgeline areas." Subdivision (E) provides certain exceptions: "Exceptions. It is recognized that from time to time, it may be necessary for improved public street access or fire protection vehicle access to be taken across identified primary ridges to promote the public health, safety and general welfare, to insure adequate traffic circulation, and

[3] Please note that these comments, including technical comments were prepared with the assistance of Dr. Dan Tormey. A copy of Dr. Tormey's resume is included with this comment letter as Attachment A.

to provide appropriate ingress and egress for emergencies. In such cases, the city council/planning commission may declare a need for a public street crossing a primary ridge, and all grading and improvement plans for such public street, including necessary accessory engineered slopes and utility extensions underneath the street, or fire road shall be subject to the
L94-8 approval of the city council/planning commission." Subdivision (G), in turn, states: "Utilities. Nothing in this section shall prohibit the maintenance, upgrading or improvement of existing public or quasi-public utilities which traverse identified primary ridges."

The types of utilities required of a subdivision project are distinct from the infrastructure required of the Project at issue. Because Title 16 of the City's Municipal Code is inapplicable, it is inappropriate to rely upon the alleged exemption to excuse the analysis otherwise required in an EIR prepared under CEQA. Doing so only sweeps potentially significant impacts of the Project under the rug. (See *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App. 3d 692, 733 ["A legally adequate EIR...'must contain sufficient detail to help ensure the integrity of the process of decision-making by precluding stubborn problems or serious criticism from being swept under the rug.'"].)

Technical Basis for Issue: Potentially significant impacts in aesthetics, land use, and noise were dismissed because the DEIR claims the Project is a utilities project/utilities land use. This approach deprives the public and City decision-makers of information that is required by CEQA. Each instance is described in the following.

L94-9 *Aesthetics.* The Project is in part located on a ridgeline, which violates Glendale's anti-ridgeline development goals for aesthetics. Rather than clearly stating this adverse aesthetic impact, the EIR states: "While construction of the proposed water tank would occur on a primary ridgeline, the proposed Project is a utilities land use that is exempt from the requirements of GMC related to development on identified primary ridges (see Section 4.1.2.3)." (DEIR, p. 4.37.)

Land use and Planning. An industrial internal combustion engine for landfill gas combustion is not consistent with the zoning for the area, which is Recreation/Open Space, Very Low Density Residential/Open Space, Special Recreation, and Restricted Residential (R1R). Because the proposed power plant, water tank, water and gas pipelines are not consistent with any of these zoning classifications, the Project would
L94-10 require a Conditional Use Permit. In addition, as noted for Aesthetics, portions of the Proposed Project site would be located within a designated ridgeline area that does not allow development. Buried within the pages of analysis is the key finding: a CUP is only allowable because of the utility use designation for the Project. Because the utility use designation is inapplicable, as explained above, approval of the Project requires amendment to the existing SR (Special Recreation) zoning and/or land use (Recreation/Open Space) designations to ensure consistency under the State Planning and Zoning law. The DEIR should be revised and recirculated to include these revisions as part of the proposed Project.

Noise and Vibration. The DEIR identifies some potentially significant noise impacts, but misses several that would affect the nearest sensitive receptors in the Eagle Rock
L94-11 community. All are dismissed, however, based on the inapplicable Utilities Exemption. The following bullets summarize these significant issues.

L94-11

- The DEIR's noise and vibration impacts analysis omits consideration of the potential effects resulting from construction of the proposed water pipeline and proposed gas pipeline. Construction of the water and gas pipeline would result in a temporary increase in noise to the existing environment from on-road and off-road heavy equipment. Construction activities associated with installation of these features would generate noise and vibration in close proximity to sensitive receptors including adjacent parks and residences, which would likely be subject to noise levels in excess of the applicable noise thresholds and result in a significant impact. However, the DEIR erroneously states, again, that the Glendale Noise Ordinance exempts utilities from the provisions of CEQA. The reasonably foreseeable and potentially significant impacts of the Project are not properly disclosed as a result.

  The analysis should clearly describe the expected increase in noise levels (direct and cumulative) and compare these levels to the existing baseline and thresholds of significance, in order to fully disclose the potentially significant temporary impacts. Without this analysis, the EIR omits information necessary for informed public decision-making.

  The DEIR states on Page 4.251 that construction noise model results are included in Appendix H. Appendix H does not contain noise modeling results. It is later stated on Page 4.254 that construction noise model results are included in Appendix J. Appendix J also does not include the noise modeling result for construction activities (only the noise model results for operation of the facility are included in the appendix). Based on our search for the stated modeling results, we can only conclude they were not provided. We, therefore, cannot determine whether the modeling of noise from the construction activities include not only the noise generated from construction activities associated with the facility, but also the "whole of the project" – i.e., the pipelines and traffic on local roads generated during construction of all project components. Whether or not the pipeline construction traffic is included, the main issue is that the impact is significant to the local community and this must be identified and mitigated under CEQA. Reliance on the utility exemption to find a less than significant impact is inadequate.

- The lack of the required noise modeling results also prevents determination of the significance of noise associated with facility operation; the noise model results for operation of the facility included in Appendix J do not correspond with the data included in Table 37 (page 4.251) of the Draft EIR. Similarly, Table 37 on page 4.251 and Table 40 on page 4.254 both include a summary of noise levels for project construction. However, the construction noise levels are not the same in both tables. The results presented in Table 37 indicate that construction noise levels would exceed the applicable threshold at sensitive receptor R4 with an increase of greater than 5 dBA, which would result in a significant impact.

- The impact analysis also does not consider impacts to the Lower Scholl Canyon Park or Scholl Canyon Golf Course, which would be considered sensitive land uses that would be directly impacted by Project construction and operation noise. These are not included in the impact discussion. The issue with the analysis is that even if it were

properly disclosed to the local community that there is a significant noise impact to these recreational areas, the Project would rely on the utility exemption.

- The construction vibration impact analysis does not consider construction of pipelines in close proximity to residents. Specifically, the proposed gas pipeline would be installed within 100 feet of the residence located at 2840 Glen Canyon Dr. Using the equation provided in the impact analysis: peak particle velocity of equipment at 25 feet x (25/distance to receptor)^{n}, where n is 1.1 (the value related to the attenuation rate through ground), the corresponding equation for a structure within 100 feet would be 0.210 (in/sec) x $(25/100)^{1.1}$ = 0.04 in/sec. This would exceed the stated threshold of 0.01 in/sec and, therefore, would result in a significant impact.

L94-11

Issue Resolution: The Project would potentially result in significant impacts and community compatibility issues involving aesthetics, land use, noise, and vibration. Rather than rely on the inapplicable exemption under the Municipal Code for Subdivision developments and their related utility improvements, the DEIR should be revised and recirculated to instead identify the potential effects of the Project on the environment, as identified above, and require all feasible mitigation where significant.

L94-12

Issue 3- Project Alternatives: Alternatives are described in a cursory manner, and not analyzed in sufficient detail to differentiate impacts between the alternatives and the proposed Project, including in order to select the Environmentally Preferred Alternative. Although the CEQA Guidelines support impacts of the alternatives being analyzed in a comparative manner to the impacts of the Project, the EIR does not describe the impacts sufficiently to allow for a meaningful comparative analysis. To this extent, the courts have required lead agencies to quantify an alternatives analysis to the extent feasible. (See *Kings County Farm Bureau*, *supra*, 221 Cal.App.3d at pp. 733–734 [EIR deficient for failing to quantify the extent to which a natural gas facility alternative would reduce the proposed project's consumption of water].)

L94-13

In addition, several alternatives are not selected for further analysis in the DEIR although they appear to meet the one Project objective and would be feasible to construct, operate, and maintain while avoiding or substantially lessening the significant adverse impacts of the proposed Project.

Technical Basis for the Issue: The comparison of impacts resulting from the selected alternatives does not provide sufficient detail of the associated impacts in order to differentiate between the alternatives for the selection of the Environmentally Preferred Alternative. Specifically, the Alternatives discussion does not provide a comprehensive comparative analysis, including quantification, where feasible, by resource category to enable an informed decision-making process. (See CEQA Guidelines Section 15126.6(d).)

L94-14

The first 17 pages (half the chapter), for example, includes only a detailed discussion of beneficial use of landfill gas in California. This discussion is not appropriate for an alternatives analysis. Rather, it should serve as part of the background or purpose and need for the Project. Specific deficiencies of the alternatives analysis are further described as follows:

- Fuel Cells: To be consistent with the Air Quality Management Plan (AQMP), SCAQMD is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in nonattainment status. Specifically, Stationary Source Regulatory Measure CMB-01 – Transition to Zero and Near Zero Emission Technologies for Stationary Sources proposes the replacement of traditional combustion sources with zero and near-zero emission technologies including low NO_x emitting equipment, electrification, battery storage, alternative process changes, efficiency measures, or fuel cell technology.

L94-15

The DEIR does not demonstrate, based on substantial evidence or a detailed analysis, how the fuel cell alternative fails to meet most of the basic Project Objectives, is infeasible or how the alternative would not avoid or otherwise reduce the significant environmental impacts of the Project. Specifically, the fuel cell alternative would meet the one objective to "*Safely capture all the LFG generated by the SCLF as required by regulatory standards and use the captured LFG generated by the SCLF for beneficial purposes such as combusting the LFG to generate power*."

In addition, this alternative would be feasible to construct, operate, and maintain, and would potentially avoid the significant air quality impacts of the Project. The discussion provided in the DEIR describes two main drawbacks of utilizing fuel cells to make electricity: 1) landfill gas would have to be scrubbed to remove certain constituents, and 2) numerous cells would have to be fuel cell packages that would have to be combined together to consume all the methane available. However, the Proposed Project RICE also requires pre-treatment of the landfill gas, including a large area required for the condensate treatment system, landfill gas compressors, and conditioning systems. Depending on the configuration, it is likely that the additional equipment for pre-treatment required for the fuel cells would not require a larger footprint than the Proposed Project.

As such, this alternative should be brought forward for review, as part of a revised and recirculated alternatives chapter, as a viable alternative to the Proposed Project, including in order to comply with the Stationary Source Regulatory Measure CMB-01. In addition, this alternative would eliminate the potentially significant health risk associated with toxic air contaminant emissions from the RICE unit.

- For microturbines and a generator, the DEIR concludes: "This alternative would not avoid significant environmental impacts of the proposed Project" without any supporting analysis to this claim. Both options may be more clean-burning and the AB2588 risks might be lower than the Proposed Project. Specifically, as described for Major Issue 1 above, the HRA completed for the Proposed Project does not consider the five compounds that caused the preponderance of health risk at the Grayson Power Plant from burning landfill gas. The combustion engines and flares associated with the Proposed Project at Scholl Canyon Landfill would presumably result in emissions of the same toxic air contaminants as those determined to cause health risks greater than the applicable thresholds at the Grayson Power Plant as a result of combustion of the same Scholl Canyon Landfill gas. Accordingly, the impact analysis provided in Section 4.2 appears to underestimate the health risks to receptors.

L94-16

L94-16 Given this deficiency in the impact analysis, the fuel cell and microturbine alternatives may result in avoiding or substantially lessening the significant impacts of the proposed Project and should, therefore, have been carried forward for full analysis. Without consideration of the impacts associated with each of these options, it is not possible to determine if they have the potential for being the Environmentally Preferred Alternative.

L94-17
- Alternative 2 - Convert landfill gas to compressed natural gas (CNG): The alternative analysis states: "This alternative would not have any potential environmental impacts less than the proposed Project. It would have lower operation phase emissions of air pollutants, greenhouse gases, and noise compared to combustion of the LFG in internal combustion engines to generate electricity." This alternative should at least be screened considering the health risks of the toxic air emissions from the RICE (see Major Issue 1 above).

L94-18
- Alternative 4 – Locate Engine Generators at Another Location: For this alternative, the proposed RICE system would be relocated to an alternate location, such as Grayson Power Plant and cleaned landfill gas would be transported by the existing pipeline to the Grayson Power Plant. The analysis for Potential Environmental Impacts Greater than the Proposed Project does not provide enough detail to compare impacts in order to select the Environmentally Preferred Alternative.

L94-19 **Resolution of the Issue:** The DEIR does not adequately demonstrate that several of the alternatives that were not selected for further analysis fail to meet most of the basic Project Objectives, are infeasible, or would avoid significant environmental impacts. The DEIR should bring forward the fuel cell and alternate location alternatives for an environmental resource-specific analysis. Depending on the resolution of Major Issue 1, both microturbines and vehicle fuel source alternatives should also be analyzed in an environmental resource-specific comparative analysis. The comparative analysis of the associated impacts of the alternatives selected for analysis should be provided in sufficient detail through resource category-specific presentation in order to differentiate between the alternatives for the selection of the Environmentally Preferred Alternative.

L94-20 **Issue 4- Transportation Analysis:** The Traffic analysis is inconsistent across the document, and the basis of the analysis (level of service) does not support comparison to the CEQA resource question based on vehicle-miles travelled (VMT). Taken together the traffic impacts are not clearly disclosed, and an insufficient basis is provided to determine whether the traffic impacts would be significant and require the adoption of mitigation or alternatives.

L94-21 **Technical Basis for the Issue:** Current CEQA Guidelines identify vehicle miles travelled (VMT) as the required metric, for documents released after July 1, 2020, to evaluate a project's transportation impacts. (CEQA Guidelines, § 15064.3.) The transportation impact discussion provided in the DEIR relies on analysis of changes to level of service (LOS) and other metrics generally no longer used to as a determinant of significant environmental impacts under CEQA. Failure to include any VMT analysis in the EIR would render it deficient under CEQA.

L94-21

In addition to the absence of an assessment of Project-related VMT, the impact analysis for traffic impacts associated with construction that is provided in the DEIR is inconsistent throughout the discussion. The Traffic Analysis presented in Appendix K.1 indicates that the Proposed Project would result in a peak hour volume of up to 23. However, it states on page 4.266 that construction would result in up to only five trips per hour. On page 4.267 it states that the Proposed Project would result in only one peak hour trip. On page 2.21, the number of trips specified for Phase III includes three trucks and 20 worker vehicles, which would equate to the maximum expected peak hour volume of 23. This expected peak hour volume of 23 is presumably what was used in the Traffic Analysis included in Appendix K.1. Accordingly, the impact analysis should be consistent with the numbers presented in the Traffic Analysis.

If the DEIR continues to also keep the stated changes in LOS as a threshold, the resulting change in LOS and V/C increase associated with the p.m. construction-related traffic (up to 23 vehicles during peak hours) may result in triggering the threshold and result in potential inconsistencies with the General Plan or adopted standards (of a change in V/C greater than 0.04 for an intersection operating at LOS C, 0.02 for an intersection operating at LOS D, or 0.01 for an intersection operating at LOS F).

As detailed in the analysis, westbound ramps have a LOS of F in the a.m. and LOS C in the p.m. Therefore, if 23 additional peak hour trips result in an increase in the V/C of greater than 0.01 at the westbound ramps or 0.02 at the eastbound ramps, the Proposed Project would result in triggering the threshold. In addition, Section 4.11.4.2 Operation refers to Section 4.11.4.1 Construction for impact analysis related to operation traffic impacts. However, Section 4.11.4.2 does not address expected traffic associated with operation of the Proposed Project. Similarly, Section 4.11.4.4 Operation refers to Section 4.11.4.3 Construction for impact analysis related to operation traffic impacts. However, Section 4.11.4.3 does not address issues related to operation of the Proposed Project.

L94-22

Resolution of the Issue: The DEIR should be revised to include an analysis of Project-related VMT rather than rely on the analysis of metrics (LOS) which is no longer used as a determinant of environmental impacts. The impact assessment should include not only construction impacts, but also a discussion of the impacts specific to operation of the Project.

OTHER ISSUES

L94-23

Resource Category	Issue	Implication or Resolution
Project description	The Project Description is incomplete and omits several requirements of CEQA Guidelines section 15124. First, the Project Description includes only one project objective for which, it appears, only the proposed project would fulfill. (See DEIR p.2.4). For example, only the proposed project would capture LFG and use it for beneficial purposes "such as combusting the LFG to generate power." Overly narrow project objectives, as here, result in improperly circumscribing an agency's consideration of project alternatives. (See *North Coast Rivers Alliance v. A.G. Kawamura*	Improve the Project Description with additional project objectives and information

L94-23		(2016) 243 Cal.App.4th 647, 688.) To comply with CEQA, the City must revise and recirculate the DEIR with a Project Description that includes additional project objectives that reflect a broader range of both public and private aims, including objectives that recognize the need to be protective of health and safety of nearby residents, the environment, and the potential to convert LFG to LNG or CNG. Without such revisions, the City is poised to reject alternatives for not meeting the one project objective. Second, the Project Description omits the intended uses of the DEIR. (CEQA Guidelines, §15124, subd. (d)(1).)	
L94-24	Air	Since the Proposed Project includes the abandonment of the existing landfill gas pipeline from Scholl Canyon Landfill to Grayson Power Plant, the impact analysis should include a discussion to demonstrate compliance with South Coast AQMD, Rule 1149, *Storage Tank and Pipeline Cleaning and Degassing*, as well as a discussion of the methods and associated air quality impacts for the abandonment of the existing pipeline.	Improve description of regulatory compliance
L94-25	Air	The CalEEMOD construction emission estimates are based on a total graded area of 3 acres. However, the footprint for the proposed gas pipeline subarea and ten-foot right-of-way (ROW) is 0.76 acres. The footprint for the proposed water pipeline subarea and 14-foot ROW is 1.49 acres and the footprint for the proposed facilities is 2.2 acres for a total graded area of 4.45 acres as specified on page 4.230. The modeled construction emissions should be consistent with the actual expected total graded area to ensure the analysis includes the "whole of the Project" as required by CEQA.	Improvements to model
L94-26	Air	The emission factors for NO_x used to estimate the criteria pollutant emissions from the engines were based on the required emission limits pursuant to SCAQMD Rule 1110.2. However, as stated on the GE J 620 GS-F21 Equipment Specification provided in Appendix B.2.3, NO_x levels are expected to drift upwards as deposits caused by contaminations in the gas build-up in the engine and as the engine experiences normal wear. This is similarly true for CO. The impact analysis does not adequately consider the long-term operation of the engine units and the associated increase in air quality impacts over time, including potential health effects.	Long-term criteria air pollutant levels may be worse than modeled
L94-27	Air	The analysis is inconsistent on the data presented for operational emissions. On page 4.62 it states: *"To account for the uncontrolled emission rates and estimate maximum daily emissions, the following daily operating schedule is assumed:* *1) Three engines run 22 hours in normal operation and 2 hours in start up/shutdown mode.* *2) One engine runs 12 hours in normal operation, 10 hours in maintenance, and 2 hours for start up/shutdown."* However, the data presented in Appendix B.2.1 is based on the 30-day average emissions, which are far below the expected maximum	Model under-represents worst-case day, which must be disclosed and considered in a revised analysis and could lead to a significant impact

L94-27		daily emissions. Use of the lower 30-day average may underestimate the expected impacts on air quality. The more conservative maximum daily emissions should be used as a basis for comparison to the SCAQMD Mass Daily Significance Thresholds for Operations Emissions as detailed in Table 13 on page 4.63. Using the maximum daily emissions, the Net Operations Emissions would exceed the SCAQMD Mass Daily Significance Thresholds for Operations Emissions for NO_x and CO.	
L94-28	Air	The modeled air quality emissions presented in Appendix B.3.2, AERMOD Input Summary is inconsistent with the data provided in Appendix B.2.3, GE J 620 GS-F21 Manufacturer Emissions Guarantee and Other Engine Parameters. Specifically, the data input used for the AERMOD model uses the NO_x emissions of 3.949 g/s for Generator 1 and 0.153 g/s for Generators 2-4 for a total project impact of 0.030 ppm for 1-hour NOx, and CO emissions of 7.1 g/s for Generator 1 and 1.1 g/s for Generators 2-4 for a total project impact of 0.0145 ppm for 1-hour CO (presented in Table 18, page 4.96). The greater emission values for Generator 1 is presumably under the uncontrolled emission state and the value for Generators 2-4 are presumably under the controlled emission state. However, in Appendix B.2.3, the manufacturer only specifies a performance guarantee of NO_x=11 ppmv, CO=250 ppmv, and VOC=30 ppmv. Accordingly, it appears that the AERMOD results underestimate the impacts for NO_x, as well as for the other parameters for operation of the four units. With use of the greater emission rates specified by the manufacturer, the Proposed Project would likely result in exceedance of the applicable limiting standard and would result in a significant impact.	Additional inconsistencies in the air modeling, which, if corrected, could lead to more intense level of environmental impact
L94-29	Air	The criteria and toxic emissions from the Internal Combustion Engines/Cogeneration system appears to be based on an energy input rating of 26.34 mmbtu/hr, even though the manufacturer's specified maximum energy input is rated at 23.9 mmbtu/hr. The Air Quality analysis should be revised by using one energy input rating consistent throughout the DEIR (i.e., GHG impact analysis) and associated appendices.	Model inconsistencies
L94-30	Cumulative Impacts	The DEIR's cumulative impacts analysis should also be revised to consider more than the one identified related project (the Grayson Repowering project), which is carried forward throughout the EIR. (See CEQA Guidelines, § 15130.) This is particularly important for the air quality and GHG analysis. The cumulative air quality analysis, for example, encompasses only 2 paragraphs and conclusively finds a less-than-significant impact. The DEIR finds "Given the distance between the projects and the level of impact from each project, it is reasonable to conclude that the combined impact of the two projects would also be less-than-significant." (DEIR, p. 4.103.) This approach ignores, for example, the extreme non-attainment	

L94-30		designation of the air basin (for 8 hour ozone) (federal) and non-attainment designation (CA) ozone), as well as the non-attainment status for PM10 and 2.5, undermining the potentially cumulatively considerable contribution of the Project to the already degraded air basin. The same is true for GHG emissions considering the severity of climate change to the planet. (See also DEIR, p. 3.2-3.3.) The DEIR's analysis also appears to base its conclusions on a "de-minimis" approach, finding that because the project's incremental contributions are small, the cumulative contribution is also less-than-significant. This approach has been rejected by the courts. (See *Communities for a Better Env v. California Resources Agency* (2002) 103 Cal.App.4th 98.)	
L94-31	Climate Change	The data provided in Table 30 on page 4.199 is not consistent with the data provided in Appendix F, Greenhouse Gas (GHG) Emission Inventory. Specifically, the modeled results provided in Appendix F specify a total CO_2^e of 57,683 MT/year. However, the data presented in Table 30 specifies a total CO_2^e of 48,375 MT/year. Using the data provided in Appendix F and the stated baseline GHG emissions of 43,621 MT/year, the Proposed Project would result in a net increase of 14,062 MT/year in addition to those contributed from construction activities. This would result in a net increase of GHG emissions from the Proposed Project greater than the significance threshold of 10,000 MT/year, resulting in a significant impact.	The increase of GHG from the new unit would be 14,000 metric tons per year (MT/year), which is above the SCAQMD significance criterion of 10,000 MT/year.
L94-32	Climate Change	The total greenhouse gas emissions of 57,683 MT/year of CO_2^e was based on the input rating of 124.806 mmbtu/hr, which was about five times the manufacturer's rating of 23.9 mmbtu/hr per engine. The GHG analysis should be revised by using one energy input rating consistent throughout the DEIR (i.e., Air Quality impact analysis) and associated appendices.	Inconsistency in model inputs
L94-33	Hazards	*Aqueous ammonia:* 19% aqueous ammonia proposed for the RICE unit can be acutely hazardous, and triggers California Accidental Release Prevention (CalARP) Risk Management Program compliance. The DEIR fails to analyze the potentially significant transport risk of this hazardous material, and its potential effect to the local community along the transport route. Typically, a risk analysis of aqueous ammonia at this concentration includes catastrophic storage tank failure, an ammonia unloading accident, and a release during transport of ammonia to the site.	May not be a significant impact, but the risk of transport of this compound to the RICE must be analyzed and disclosed
L94-34	Wildfire Risk	The Proposed Project is located within a Local Responsibility Area (LRA) mapped by CalFire as Very High Fire Hazard Severity Zone (VHFHSZ), which is the most at risk for fire within the State. The Proposed Project is located in an area with steep topography, flammable vegetation, and limited access in the area. The region has a history of fires, with the entire northern two-thirds of the City having burned since the 1800s. Although the DEIR, correctly,	May not be a significant impact, but locating the Proposed combustion project in the

L94-34		identifies the Proposed Project has having a significant unmitigable impact to wildfire risk, no alternatives are developed to find a safer location. Is this the best location to cite a combustion unit? Given the unprecedented wildfires in California this year, the DEIR should be revised to include a range of alternatives, including an off-site alternative or additional mitigation measures that would avoid or lessen this impact.	highest possible fire risk area should be clearly disclosed, including the effects of wildfire since such an event is foreseeable

CONCLUSION

L94-35 Please include LASAN in the City's list for purposes of providing notice of any future revised and recirculated DEIR, availability of the Final EIR, and Notice of Determination, if one is filed, and future agendas and staff reports for any public hearings.

LASAN appreciates the opportunity to respond to this DEIR. Should you have any questions, please contact Hassan Rad, Division Manager of the Regulatory Affairs Division at (213) 847-5186.

Sincerely,

ENRIQUE C. ZALDIVAR, P.E.
Director and General Manager
LA Sanitation and Environment

ECZ/PC:pc

Attachment A: Dan Tormey, Ph.D, P.G., Technical Expert Resume

c: Tim McWilliams, Los Angeles City Attorney's Office
Steve Martin, Los Angeles City Attorney's Office
Avak Keotahian, Office of the Chief Legislative Analyst
Jose Hernandez, Council District 14
Traci Minamide, LASAN – EXEC
Mas Dojiri, LASAN – EXEC
Hassan Rad, LASAN – RAD
Paul Cobian, LASAN – RAD

ATTACHMENT A

DAN TORMEY, Ph.D., P.G., TECHNICAL EXPERT RESUME



Dan Tormey, Ph.D., P.G.

President, Technical Director

Summary of Qualifications

Dr. Tormey is an expert in energy, water resources, land management and environmental policy. He has served as a technical expert in state and federal court, including testimony in Federal Court on questions related to water supply and sustainable yield and testimony in state court on contaminant assessment, fate and transport, risk assessment and remediation. Other litigation and testimony have included water quality and quantity, water rights, and Endangered Species Act issues.

Dr. Tormey has been project manager or technical lead for many controversial CEQA and NEPA projects and is noted for the creativity of his policy and technical approaches. He has managed CEQA/NEPA reviews both for regulatory agencies (US Federal Energy Regulatory Commission, US Bureau of Land Management, US Bureau of Reclamation, US Forest Service, California Public Utilities Commission, California State Lands Commission, United States Forest Service, California State Water Resources Control Board, and San Diego Regional Water Quality Control Board, municipal entities) and for private-sector applicants.

Dr. Tormey has managed several "first in class" CEQA/NEPA projects, including the EIS for the first offshore liquefied natural gas terminal in the United States (Port Pelican, Gulf of Mexico); the Environmental Impact Report/EIS for the first such terminal offshore of California (Cabrillo Port, Ventura); the first use of the Federal Energy Regulatory Commission's backstop authority to override state denials of interstate transmission line projects (SCEs Devers to Palo Verde 2 500 kV transmission line project in Arizona and California); the first LNG terminal in Senegal; the first EIR for a reverse osmosis water treatment system for produced water treatment at an oil field (Arroyo Grande Oil Field, California); and the largest dam removal in the country (PacifiCorp Klamath Hydroelectric System Dam Removals).

He works with the environmental aspects of all types of electrical generation and transmission; water resources; oil and gas development and decommissioning; and land management and transfer. He has conducted important assignments in onshore, offshore, nearshore, estuarine, riverine and glacial environments. Dr. Tormey is the designated geomorphology expert in the Santa Clara River watershed (by Regional Water Quality Control Board, Los Angeles County), and his work on the Kern River led to his selection by the National Academy of Sciences to the 8-person science advisory board guiding the development of the management plan for Giant Sequoia National Monument; his role was physical sciences and watershed function. He is an on-call technical expert on oil and gas issues for Ventura County Planning Department.

Education

- Ph.D., Geology and Geochemistry, MIT, 1989
- B.S., Civil Engineering and Geology, Stanford University, 1983

Registrations

- Professional Geologist

Appointed

- U. S. National Academy of Sciences: Science Advisory Board – Giant Sequoia National Monument (2002-2008)
- U.S. National Academy of Sciences: Steering Committee on Geoheritage (2020-present)
- Society of Petroleum Engineers Distinguished Lecturer 2015-2016
- SPE Award for Environmental and Social Responsibility 2017
- IUCN Geoscientist Specialist Group (2015-present)
- UNESCO World Heritage Site Review Panel (2009 - present)
- California Council on Science and Technology: Hydraulic Fracturing Study (2014-2015)
- California governor and legislature-appointed advisory committees on oil and gas issues (2014-present)
- Executive in Residence – California Polytechnic University (2004)
- Lead Scientist, Cruz del Sur (Andean post-disaster search and rescue group)
- Fellow, Explorers Club

Dr. Tormey has been at the forefront of evaluating the impacts of development projects on global climate, including quantification of the Social Cost of Carbon, variability in trapping efficiency of different compounds, and different types of mitigation strategies. He has evaluated technologies to enhance the utility of carbon capture and storage through improved combustion, and pilot storage and carbon sequestration projects.

Representative Project Experience

Programmatic EIR for Stormwater Management Program – City of Los Angeles Bureau of Sanitation

Project manager for a comprehensive review of a transformative stormwater management program in the City of Los Angeles, triggered by the Los Angeles Regional Water Quality Control Board new MS-4 permit. Evaluated low-impact design, numerous innovative infiltration measures, and other techniques for urban stormwater management.

Reliant Resources Application for New Power Plant — Rancho Cucamonga, California

Project manager for the preparation of an Application for Certification (AFC) submitted to the California Energy Commission (CEC) for a proposed 350 MW peaking power plant in Rancho Cucamonga, California. The AFC was prepared under the emergency fast track provisions for a 6-month review. As such, the report included satisfaction of all the requirements for a standard 12-month review, and additional determinations including environmental justice, cumulative impact analysis, detailed hazard evaluation and risk assessment, and visibility modeling.

EIR for Bacteria TMDL Compliance in Ballona Creek – City of Los Angeles Bureau of Sanitation

Project manager for EIR evaluating the impacts of the City's proposal to comply with bacteria TMDL limits in Ballona Creek and major tributaries. The project consists of three diversion structures, designed to capture all dry-season runoff. Analysis included potential effects to Ballona Estuary and Ballona Wetlands.

CEQA Review of SCE's Gas-Fired Generation Capacity — Southern California

Project manager and technical lead for the preparation of a Proponent's Environmental Assessment of Southern California Edison's proposal to divest its twelve gas-fired generating stations in the Counties of Los Angeles, Ventura, Santa Barbara, Riverside, San Bernardino, and Orange in California. The action was recommended by the CPUC as part of their strategy for deregulating the electrical industry. Development of the project description and scope required close interaction with several Edison divisions, outside legal counsel, and ENTRIX technical specialists preparing chapters.

Comprehensive analysis of impacts of high-volume hydraulic fracturing at an oil and gas field in California

In the first-ever environmental study of its type, Dr. Tormey is technical lead for evaluation of the effects of high volume hydraulic fracturing on the local environment at an oil and gas field in California. Analysis uses numerous lines of evidence, including a monitor well array with chemical and methane sampling (including isotopes of methane), microseismic measurements, vibration and noise analysis, and characterization of the environmental attributes of the chemical packages used.

Salt River Project Generating Station Remediation Risk Prioritization—Phoenix, Arizona

Project lead for the compilation and evaluation of environmental risks associated with remediation of contamination at generating station assets within the Salt River Project's portfolio and other aspects of human health and ecological risk associated with power generation. Also led a series of workshops with SRP to identify potential environmental issues and their consequences with the objective of prioritizing potential remedial actions.

Programmatic EIR for Dairy Approval — Merced County, California

Project Manager for the Programmatic EIR to evaluate Merced County's proposed Animal Confinement Ordinance. The project considered the cumulative impacts to all resource categories, with particular emphasis on impacts to water quality, air quality, human health risk and land use. The document was prepared in an atmosphere of litigation and mistrust among stakeholders but has not been subject to legal challenge.

L95

From: Jose Hernandez
To: Krause, Erik
Cc: Avak Keotahian; Eduardo Hewitt; HASSAN RAD; Paul Cobian; Tim McWilliams; Steve Martin; jennifer@kevindeleon.com; info@kevindeleon.com
Subject: Comments on the Draft Environmental Impact Report related to the Biogas Renewable Generation Project
Date: Friday, September 25, 2020 2:52:43 PM
Attachments: CD14SchollCanyonletter.pdf

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Krause,

L95-1 On behalf of the constituents of Council District 14, Council District 14 submits the attached comments related to the City of Glendale's Draft Environmental Impact Report, in relation to the Biogas Renewable Generation Project.

Thank you for the opportunity to respond to this critical issue. Please contact, Jose Hernandez, Public Projects Manager & Field Deputy, should you have any questions or concerns at (213)254-5295.

Thank you,

José Hernandez
Public Projects Manager & Field Deputy
City of Los Angeles | Council District 14
Northeast Office
2035 Colorado Blvd.
Los Angeles, CA 90041
(323) 254-5295 Office | (213) 220-3467 Cell | (213) 485-8788 Fax
Jose.H.Hernandez@lacity.org

CITY HALL
LOS ANGELES, CALIFORNIA 90012

September 25, 2020

Biogas Renewable Generation Project DEIR
Attn: Erik Krause, Director of Community Development
City of Glendale
633 E. Broadway, Suite 103
Glendale, CA 91206
Via e-mail at ekrause@glendaleca.gov

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT PREPARED FOR THE BIOGAS RENEWABLE GENERATION PROJECT AT SCHOLL CANYON LANDFILL (SCH NO. 2017081062)

Dear Mr. Krause:

Los Angeles City Council District 14 (CD14), which includes Eagle Rock and Northeast Los Angeles, remains concerned about the current operations and proposals for the Scholl Canyon Landfill in the City of Glendale.

L95-2 While CD14 continues to maintain that it is inadequate to divide the environmental reviews of two clearly related projects, the Grayson Repowering Plant and the Biogas Generation Project, we appreciate Glendale's efforts to analyze the impact and potential alternatives to the proposed landfill gas (LFG) power plant. CD14 acknowledges the efforts made in this Draft Environmental Impact Report (DEIR); however, our office does not believe that these efforts adequately analyze the impact and alternatives to the Biogas Generation Project. In short, CD14 maintains that the present DEIR cannot be characterized as a full and comprehensive analysis.

L95-3 CD14 has submitted comments in a letter dated April 12, 2019 and staff provided oral comments at the Public Scoping Meeting (April 4, 2019, 6 p.m., at the Glendale Police Departments Community Room in Glendale, CA) as well as in past public comment opportunities for the Initial Study (IS) and Mitigated Negative Declaration (MND). Although CD14, along with various Eagle Rock community groups, advocated and petitioned for the City of Glendale to hold a public meeting in the community of Eagle Rock during the draft MND, we are disappointed the City of Glendale did not provide an equivalent opportunity during the DEIR process.

L95-4 Over the course of the past three years, CD14 staff have attended the various community group meetings in Eagle Rock in which resident and community concerns regarding this project have been heard and received. A list of these meetings is included below:

L95-4

Organization Meeting	Date	Time
Eagle Rock Neighborhood Council Board Meeting	October 3, 2017	7:00 pm
Eagle Rock Neighborhood Council Board Meeting	November 7, 2017	7:00 pm
Eagle Rock Neighborhood Council Board Meeting	April 3, 2018	7:00 pm
Eagle Rock State of the Town Address	April 11, 2018	7:00 pm
Eagle Rock Neighborhood Council Board Meeting	August 6, 2019	7:00 pm
Eagle Rock Neighborhood Council Board Meeting	July 7, 2020	7:00 pm
Eagle Rock Neighborhood Council Sustainability Committee Meeting	August 25, 2020	7:00 pm
Eagle Rock Neighborhood Council Board Meeting	September 1, 2020	7:00 pm
East Area Progressive Democrats Monthly Meeting	(Scheduled) September 29, 2020	7:30 pm

L95-5 CD14 concerns are consistent with the comments it has provided in the aforementioned proposed project analyses and deliberations discussed in community meetings. Despite conforming to the wishes of public sentiment by conducting an Environmental Impact Report (EIR), CD14 remains disappointed that Glendale continues to tailor its analysis solely to justify its preferred project. Specifically, Glendale has neglected CD14 suggestions to revise the scope and project description and to analyze all possibilities of cleaner technology. Additionally, Glendale has:

L95-6
- Refused to present what would be required to clean the gas for pipeline or other non-combustion of off-site uses

L95-7
- Insisted without justification that its current pipeline and the Grayson site cannot be evaluated as alternatives

L95-8
- Continued to neglect Eagle Rock by offering no mitigation to operations and further industrialization of the landfill.

L95-9 Despite years of CD14 requesting this kind of review, despite the continued lack of dialogue with Eagle Rock and the City of Los Angeles, despite Glendale's own City Council rejecting the adoption of an MND in order to *demand a full evaluation of the proposal and alternatives,* Glendale has taken plenty of time and resources for a DEIR that does not accomplish the purposes of a comprehensive review demanded by the public and mandated by CEQA guidelines. At the same time the wasteful flaring of the renewable landfill gas, is evidence that Glendale Water & Power is not taking this project seriously, is not taking public comments seriously, is not taking the climate crisis seriously, and has no intent to work with the City of Los Angeles to mitigate the operations and impacts of its landfill.

L95-10 Given the situation described above the Los Angeles City Council on July 3, 2019, adopted a Motion to instruct the Los Angeles Sanitation & Environment (LASAN) and the Los Angeles City Attorney to develop a response to the submitted DEIR. CD14 has been working closely with both these entities in developing comments for this DEIR. We support and agree with the comments submitted to you by LASAN on behalf of the City of Los Angeles for this DEIR.

L95-10 Eagle Rock consists of a population of over 30,000 inhabitants who are directly impacted by the proposed project. Therefore, CD14 requests that public outreach strategies include meetings in our neighborhood as a matter of course.

L95-11 Furthermore, the community of CD14 is bisected by eight major freeways (I-5, I-10, SR 60, SR 101, SR 110, SR 710, SR 2, and SR 134). These corridors already pose considerable pollution and noise burdens on the district. As per CEQA guidelines, the City of Glendale must consider the "cumulatively considerable" additional effects that this project will produce. Recognizing this, CD14 will continue to demand that the City of Glendale identify a project that offers the cleanest possible solution and/or an Environmentally Preferred Alternative—a project that best collects the harmful methane gas produced by the landfill, and best uses it for power generation without wasting irresponsibly.

L95-12 Unfortunately, the present DEIR does not provide for a comprehensive analysis, nor does it disclose all key information. It fails to fully inform key decision makers and stakeholders of potential alternatives and impacts. Contrary to Glendale's City Clerk assertion, it cannot be argued that the proposed project would not result in any significant and unavoidable environmental impacts. For these reasons, we urge the City of Glendale to revise its approach. Glendale simply must do better.

Very truly yours,

SHARON M. TSO
Caretaker, Council District 14

SMT:ak

L96

From: D Eder
To: Krause, Erik
Subject: Public Comment - Scholl Canyon Proposed Generating Station
Date: Friday, September 25, 2020 5:49:54 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Erik,

L96-1 **Please accept this email as a public comment in regards to the City of Glendale's proposal to build and operate the methane powered electric generating station.**

While we agree with the spirit of this design - using the naturally occurring methane gas to generate electricity - it is the hilltop location surrounded by grassy/wooded residential neighborhoods that is concerning.

Is the top of Scholl Canyon, surrounded by grassy/wooded residential areas of three cities (Glendale, Pasadena, Los Angeles) really the best possible location for a high temperature methane gas burning facility?

L96-2 The area is a residential, high risk fire zone, served by primarily residential streets that would offer limited access should a fire break out. Add to this the fact that the Southern California landscape is becoming drier and combustible, as an unfortunate byproduct of the increasingly hot summers of this new, Climate Crisis era.

For the past decade, we have lived at our house in the San Rafael neighborhood of Pasadena. (This is less than two miles from Scholl Canyon.) Our house is exactly on the border of Los Angeles and is in the hilly area. The threat of fire is omni-present here.

Our worst nightmare came true in late June of this year when someone's errant mylar balloon lodged in the LADWP/SCE high voltage power line behind our house. Within minutes the balloon exploded, sending flaming shards to the grassland below. We immediately began fighting the incredibly fast hillside fire with home garden houses until both the LA and Pasadena Fire Departments arrived to put it out. (Thank God for LA's fire helicopter). It was just in time as the flames were licking at the house carport.

Being witnesses to how fast grass and chaparral fires start (and it was early summer, not even the traditional autumn fire season), we shudder to think of any potential calamity that a hilltop gas plant could create, should something go wrong. Adding to this backdrop are the horrific, raging fires all along the West Coast.

L96-3 **Would it not be safer to continue to pipe the gas down the hill to the Grayson generating facility and install the new power generating units there?** Surely the City of Glendale's infrastructure could be easily adapted at that river-adjacent plant, safely within the concrete-laden industrial/commercial zones.

L96-4 **Please consider this letter in opposition to the project as it currently is proposed.** The City of Pasadena residents and Los Angeles residents, who actually border this facility, should be able to weigh in on this proposal, as the fire danger risk would really be increased for the residential neighborhoods around Scholl Canyon.

Thank you for your time and consideration.

--
David Eder
Homeowner, Southwest Pasadena

L97

From: HASSAN RAD
To: Paul Cobian
Cc: Krause, Erik; Enrique Zaldivar; Traci Minamide; Mas Dojiri; Tim McWilliams; Steve Martin; Jose Hernandez; Avak Keotahian
Subject: Re: Comments on the Draft Environmental Impact Report Prepared For The Biogas Renewable Generation Project at Scholl Canyon Landfill (SCH NO. 2017081062)
Date: Friday, September 25, 2020 11:35:43 AM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Paul,
Thank you !

On Fri, Sep 25, 2020 at 11:33 AM Paul Cobian <paul.cobian@lacity.org> wrote:

> Dear Mr. Krause,
>
> On behalf of the City of Los Angeles, LA Sanitation & Environment (LASAN) submits the attached comments on the adequacy of the City's Draft Environmental Impact Report (DEIR) prepared for the Biogas Renewable Generation Project pursuant to the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.)
>
> LASAN appreciates the opportunity to respond to this DEIR. Should you have any questions, please contact Hassan Rad, Division Manager of the Regulatory Affairs Division at
> (213) 847-5186.
>
> Thank You,
> **Paul S. Cobian**
> Environmental Supervisor II
> LA Sanitation and Environment
> Regulatory Affairs Division
> Phone: 213-847-5182
> Email: paul.cobian@lacity.org
> Web: www.lacitysan.org

L97-1

--
Hassan Rad ., PE
Division Manager
LA Sanitation and Environment
Regulatory Affairs Division
Phone:(213) 847- 5186
Email: Hassan.Rad@lacity.org
web; Www.Lacitysan.org



L98

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L98-1

How can we have a 'Jewel City' with a biogas plant at the Scholl Canyon Landfill?!

Thank you.

Sincerely,

SANTA CLARITA
25 SEP 2020 PM 3 L



STATION

Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

91206-4311 28

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L99

From: Kim Turner
To: Krause, Erik
Subject: Scholl Canyon Dump
Date: Friday, September 25, 2020 1:40:26 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

L99-1 I wish to enter my vote and opposition against the expansion of the Scholl Canyon Dump. The pollution that will be created will affect all of the residents of Eagle Rock, Glendale and surrounding communities. It will also affect all of the children that attend the area schools. The cancer rates in the area are higher than most neighborhood in Los Angeles. The dump was scheduled to close down but now the City of Glendale is trying to keep it open.

Regards,

Kim Turner
5203 Vincent Ave
Eagle Rock, CA 90041

L100

From: Lynn Woods
To: Krause, Erik
Subject: Scholl Canyon, please pass this on
Date: Friday, September 25, 2020 2:58:07 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

L100-1 Hello Erik Krause. I hope you will take my concerns seriously enough to share them with your fellow public servants of Glendale.

L100-2 In short, I can't imagine that you all don't recognize that building a gas plant at a dump located in a *fire zone* near a large community of residents and homes is not only inadvisable, but simply stupid. Is this how little my and
L100-3 my fellow Eagle Rockians' lives and health are worth to the City of Glendale?
L100-4 By pushing for an unnecessary gas plant/pipeline in Scholl Canyon, certain of your leaders--Steve Zum, to name one--are putting your city's profits over the lives of thousands of Los Angeles residents. Shame on you if you allow this to happen!

Thankfully, because of our resistance to your previous efforts to expand the dump, that expansion was defeated. Yet now we see you doubling down with an equally, if not more, egregious proposal, one that is based on multiple falsehoods, as you well know. Why is this? I can only assume that you are picking at the same old bone, trying yet again to shove the toxins of Scholl
L100-5 Canyon down our throats through lying--yet you refuse to see that such lies are themselves toxic, both to the body politic and to the people. So again, why is this? I suppose the answer is simply that you don't give a damn.

Let me make clear that I don't inherently decry Glendale for wanting to make money to support its citizens. All cities need to remain solvent. And in fact, I myself have enjoyed my time spent in your town over many years of shopping, bicycling, attending movies, strolling, and dining. But frankly, I don't intend to spend my money there anymore because your leadership has revealed itself to be morally bankrupt, as the Scholl Canyon issue reveals. *Many* of my fellow citizens in Eagle Rock and its environs feel the same way. And so it goes . . . you lose money by trying to make money through duping people.

L100-6 Please do NOT allow a gas plant to be built on this site! Also, you and your colleagues should seek out a piece of land in your own jurisdiction where you can relocate your dump, far from people's homes and lungs.

Lynn Woods
1514 Linda Rosa Ave.
Los Angeles, CA 90041

L101

From: Mary Fischer
To: Krause, Erik
Subject: Objection to DEIR Scholl gas plant
Date: Friday, September 25, 2020 11:58:46 AM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

L101-1 Mr. Krause: My neighbors and I have read the DEIR and have major concerns about Glendale proceeding with this proposed bio gas plant.
Scholl Landfill as originally agreed was to shut down completely by 2028. Will Glendale comply?Where does that stand now?

L101-2 GWP proposes a new gas pipeline that will burn off methane gas near where we live.
Considering the ongoing environmental threats of fires blazing wherever we look, this is now a proposal that is unacceptable. Our air quality is unhealthy most days now, and we will fight hard against any additional proposals that mean more pollution, noise and threat of new fires.

L101-3 And besides, there is Grayson, which is still a functioning pipeline.

L101-4 We all oppose this project.
Thank you.
Mary Fischer

Sent from my iPhone

L102

From: Melissa Estrada
To: Krause, Erik
Subject: Scholl landfill
Date: Friday, September 25, 2020 3:20:23 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Erik Krause,

L102-1 I am writing as a concerned resident about the health and wellbeing of our communities, especially regarding the effects of Scholl Canyon Landfill upon the neighborhoods closest to the landfill. I oppose the industrialization of the landfill and favor the closure and cleanup of the landfill in the near future.

The historic wildfires that we have been witnessing make it clear that climate change is here and will exacerbate many of the issues that worry us the most as time passes.

L102-2 Wildfire: Wildfire is a huge risk to Glenoaks and Chevy Chase Canyons, as well as to the nearby Linda Vista and Eagle Rock neighborhoods. Any discussion of the future of the landfill, due to its location in a designated very high fire zone, must have fire prevention and safety at the forefront. These neighborhoods have mostly narrow, single-access roads. The wildfire plan minimizes the danger and carelessly assumes that an on-site water tank and a fire department more than five miles away are sufficient.

Air Quality: We are also concerned about the unhealthy and dangerous emissions the plant will produce to pollute the air we breathe. There are cleaner solutions to burning the methane and we ask you to consider them.

L102-3 Pollution from the project will exceed the South Coast Air Quality Management District (SCQAMD) thresholds for four contaminants, but the DEIR does not discuss either mitigation or using the best available control technology (BACT). Instead, the DEIR assumes that GWP will get priority reserve credits to eliminate the pollutants on paper. Measurements of the pollutants are made from monitors that are not near the landfill.

This is NOT a green project. The priority reserve credits that GWP hopes to receive make it green on paper, but it is NOT green for our lungs, our bodies, our children, or our neighborhoods.

The DEIR also ignores carcinogenic pollutants such as dioxins and furans.

L102-4 Geology and Soils: The project will be located atop a mountain that sits near a potential 6.7 earthquake fault. Seismic waves on a mountain can be amplified to 4 or 5 times the strength of field waves, and the report both proposes insufficient mitigation measures for threats to power equipment, buildings, tanks, and pipelines and fails to present emergency back-up systems to mitigate damage from earthquakes or fire.

We all got a wake-up call just before midnight on Friday, September 18. The earthquake was a relatively mild one, but it still shook vigorously and for a long time. How would the proposed power plant stand up to a quake directly beneath it? The DEIR doesn't even address that

L102-4 possibility.

L102-5 Also, the Scholl biogas plant should not be analyzed separately from a holistic Glendale energy plan that includes Grayson Power Plant and the methane from Scholl.

L102-6 Taking all these matters into account, the DEIR for the proposed plant at Scholl Canyon has not taken into consideration any future closure plans for the landfill in relationship to the plant. Promises to close the landfill and return it to recreational use have been made and broken many times in the past. The landfill is now scheduled to close in 2028. Where, and what, is the plan for that?

L102-7 This highlights the fundamental problem, not only with the proposed power plant, but, more broadly, with the existence of a landfill, so close to our neighborhoods, unlined in parts, and in a high fire zone. A replacement for the landfill needs to be identified, and plans need to be made for its cleanup and closure, NOW, rather than at some vague point in the future.

Sincerely,

Melissa Estrada
Resident - 2523 Hollister Terrace

L103

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L103-1 (1) It would be too close to residents in Glenoaks Canyon.

L103-2 (2) It would be processing methane, a highly explosive gas, to produce electricity in a very high fire zone.

L103-3 (3) It would be running 24/7 and would be noisy

L103-4 (4) It would have a 60,000 gallon water tank + 40 foot engines on a primary ridge line in the Eagle Rock area.

Thank you.

Sincerely, Susan W. Liesing

SANTA CLARITA CA 913
25 SEP 2020 PM 6 L



Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

91206-43128

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L104

From: Claudia Puig
To: Krause, Erik
Subject: Scholl Canyon Landfill Power Plan
Date: Saturday, September 26, 2020 11:03:08 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Erik Krause,

I am writing on behalf of the Coalition for Scholl Landfill Alternatives, or CSLA, which is a group of Glendale, Eagle Rock and Pasadena residents who are concerned about the health and wellbeing of our communities, especially regarding the effects of Scholl Canyon Landfill upon the neighborhoods closest to the landfill.

L104-1

We oppose the industrialization of the landfill and strongly favor the closure and cleanup of the landfill in the near future.

CSLA would like to express some concerns about the DEIR that has been prepared in connection with the proposed power plant at Scholl. We ask that these concerns be carefully considered, because they are motivate by our deep commitment to ensuring the safety of our neighborhoods, both now and in the future. The historic wildfires that we have been witnessing make it clear that climate change is here an will exacerbate many of the issues that worry us the most as time passes.

L104-2

WILDFIRE: Wildfire is a huge risk to Glenoaks and Chevy Chase Canyons, as well as to the nearby Linda Vista and Eagle Rock neighborhoods. Any discussion of the future of the landfill, due to its location in a designated high fire zone, must have fire prevention and safety at the forefront. These neighborhoods have mostly narrow, single access roads. The wildfire plan minimizes the danger and blithely assumes that on-site water tank and a fire department more than 5 miles away are sufficient. They are not.

AIR QUALITY: We are also concerned about the unhealthy and dangerous emissions the plant will produce to pollute the air we breathe. There are cleaner solutions to burning the methane and we ask you to consider them.

L104-3

Pollution from the project will exceed the South Coast Air Quality Management District (SCAQMD) thresholds for four contaminants, but the DEIR does not discuss either mitigation or using the best available control technology (BACT). Instead, the DEIR assumes that GWP will get priority reserve credit to eliminate the pollutants on paper. Measurements of the pollutants are made from monitors that are not near the landfill. This is NOT a green project. The priority reserve credits that GWP hopes to receive make it green on paper, but it is NOT green for our lungs, our bodies, our children or our neighborhoods.

The DEIR also ignores carcinogenic pollutants such as dioxins and furans.

L104-4

GEOLOGY AND SOILS: The project will be located atop a mountain that sits near a potential 6.7 earthquake fault. Seismic waves on a mountain can be amplified to 4 or 5 times the strength of field waves, and the report both opposes insufficient mitigation measures for threats to power equipment buildings, tanks and pipelines and fails to present emergency back-up systems to mitigate damage from earthquakes or fire.

L104-4 We all got a wake-up call just before midnight on Friday, Sept. 18. The earthquake was a relatively mild one, but it still shook vigorously and for a long time. How would the proposed power plant stand up to a quake directly beneath it? The DEIR doesn't even address that possibility!

L104-5 Also, the Scholl biogas plant should NOT be analyzed separately from a holistic Glendale energy plan that includes Grayson Power Plant and the methane from Scholl.

L104-6 Taking all these matters into account, the DEIR for the proposed plant at Scholl Canyon has not taken into consideration any future closure plans for the landfill in relationship to the plant. Promises to close the landfill and return it to recreational use have been made and broken many times in the past. The landfill is now scheduled to close in 2028. Where, and what is the plan for that?

L104-7 This highlights the fundamental problem, not only with the proposed power plant, but more broadly, with the existence of a landfill so close to our neighborhoods, unlined in part and in a high fire zone. A replacement for the landfill needs to be identified, and plans need to be made for its cleanup and closure, NOW rather than at some vague point in the future.

Sincerely,

Claudia Puig

Claudia Puig
President, Los Angeles Film Critics Association
claudiapuig2@gmail.com
c: 323-246-0684
o: 818-409-9403

L105

Sept. 26th, 2020

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L105-1 I am opposed to the Biogas Power Plant due to the location nearby of the Verdugo Hills Fault and risk of methane fire and cancer risk.

Thank you.

Sincerely,

Madeleine Wills

Place
Stamp
here

Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

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L106

From: Cyndi Otteson
To: Krause, Erik
Subject: Scholl Canyon DEIR
Date: Sunday, September 27, 2020 11:05:22 AM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Krause,

L106-1 As a resident of Eagle Rock and mother of two young children, I strongly urge you to close the Scholl Canyon Dump. We have already been subjected to 60 years of polluted air. Building a gas plant in a burn area is simply irresponsible and endangers the lives of thousands of residents. In order to secure a livable future, we need to transition to 100% renewable energy. We don't want a biogas methane pipeline polluting our air.

L106-2 You have the power and responsibility to do the right thing for all residents. Please prioritize people over profit and politics and find a better solution than building a gas powered plant in a fire zone.

With gratitude,

Cyndi

L107

September 27th, 2020

Erik Krause
Deputy Director of Community Development, City of Glendale
633 E. Broadway, Room 103
Glendale CA 91026

Dear Mr. Krause,

The following are my comments about the **Biogas Plant** to be built at the Scholl Canyon Landfill:

L107-1 As a resident of Glenoaks Canyon, living only ½ mile away, it's too close to this densely populated area. This will likely increase a vulnerability for explosive/fire events associated with the production of methane, as well as unhealthful air pollution. Along with the abuse our neighborhood has suffered with a landfill promised to close (but hasn't), it's an outrageous project disregarding the well-being and health of the nearby citizens of Glendale, Eagle Rock, and Pasadena.

Sincerely,

Deirdre Wills

2613 E. Glenoaks Blvd.

Glenoaks Canyon Neighborhood Resident 21 years

L108

From: Myanna Dellinger
To: Krause, Erik
Subject: Scholl Dump
Date: Sunday, September 27, 2020 12:49:50 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Krause,

L108-1 I'm concerned about the EIR in the above not being undertaken correctly. Please correct this.

See also this from EAPD, of which I am a member and which I support:

L108-2 Build a gas plant in a burn area? What could possibly go wrong?!
#EAPD throws some refreshing cold water on bid by #Glendale to justify major buildup on the trash pile at #SchollDump.

L108-3 Entire case rests on a falsehood about a methane pipeline, which city admits is still functional but won't explain further.

L108-4 As with the dump itself, now nearing 60 years of polluting the air breathed by nearby residents, the official argument for gas plant at the site just does not smell right.

L108-5 Deadline for comment on the draft report (#DEIR) is Sept. 30. Only 5 more days to make your voice heard.

Myanna Dellinger
2327 Hill Drive
Los Angeles, CA 90041
323 500 0624

L109

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

People talk about the landfill and its expansion like it is a bad thing. As a 41-year Glenoaks Canyon resident, I would not know it is there unless I read and heard about it. It has not had a negative impact on my quality-of-life in any way. In fact, it provides an economic and environmental benefit for all of Glendale. Fuel and labor costs are lower and exhaust from heavy-duty trash trucks is minimized because they drive to a local resource, not miles away.

Processing noise from operating the plant annoying residents is a stretch at best. I have no doubt the 24-hour flow of traffic on the 134 and 2 freeways will still be heard over the methane plant.

L109-1 **Face it, this is earthquake country but that is no reason not to move forward with this project. Explosive gas running through pipes under our heavily populated streets to transport it to the Grayson power plant is a bigger risk from rupturing and exploding than a self-contained facility that can be shut down in an emergency.**

Fire-protection and prevention measures should be built into the master plan. A 60,000 gallon water reservoir could help save the canyon in a fire emergency and if someone in Eagle Rock can see it? Oh well, it's for a good cause.

The benefits of building this plant heavily outweigh any perceived or real risks that may be present. As a final item, I support the expansion of the landfill so we get more use and years out of this economic and environmentally beneficial resource.

Thank you for considering my observations in your decision-making process.

Thank you.

Sincerely,

Allan T. Herbert
2265 Hollister Terrace
Glendale, CA 91206

SANTA CLARITA CA 913

28 SEP 2020 PM 1 L



FOREVER / USA

2265 Hollister
Glendale 91206

Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

91206-431128 ~~91206~~ ??

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The zip code on the form provided by the Glendale Citywide Homeowners Assoc (GCHA) was wrong so I'm sending ~~another~~ another copy

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

People talk about the landfill and its expansion like it is a bad thing. As a 41-year Glenoaks Canyon resident, I would not know it is there unless I read and heard about it. It has not had a negative impact on my quality-of-life in any way. In fact, it provides an economic and environmental benefit for all of Glendale. Fuel and labor costs are lower and exhaust from heavy-duty trash trucks is minimized because they drive to a local resource, not miles away.

Processing noise from operating the plant annoying residents is a stretch at best. I have no doubt the 24-hour flow of traffic on the 134 and 2 freeways will still be heard over the methane plant.

Face it, this is earthquake country but that is no reason not to move forward with this project. Explosive gas running through pipes under our heavily populated streets to transport it to the Grayson power plant is a bigger risk from rupturing and exploding than a self-contained facility that can be shut down in an emergency.

Fire-protection and prevention measures should be built into the master plan. A 60,000 gallon water reservoir could help save the canyon in a fire emergency and if someone in Eagle Rock can see it? Oh well, it's for a good cause.

The benefits of building this plant heavily outweigh any perceived or real risks that may be present. As a final item, I support the expansion of the landfill so we get more use and years out of this economic and environmentally beneficial resource.

Thank you for considering my observations in your decision-making process.

Thank you.

Sincerely,

Allan T. Herbert
2265 Hollister Terrace
Glendale, CA 91206

L110

From: Marie Freeman
To: Krause, Erik
Cc: Rick Marquis; Jackie Gish; Marie Freeman
Subject: Glenoaks Canyon Homeowners Association Comments re Biogas Project DEIR
Date: Monday, September 28, 2020 12:01:40 PM
Attachments: GOCHA Biogas PDF File928.pdf

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Hello, Mr. Krause,

L110-1 Attached please find the Glenoaks Canyon Homeowners Association Comments regarding the Biogas Renewable Generation Project DEIR. The attachment contains a single file with an introductory letter, detailed collective comments from the association's Scholl Canyon Landfill Study Group, and a comment letter from the consulting firm, Soil Water Air Protection Enterprise (SWAPE).

We look forward to the City's response.

Thank you,
Marie Freeman
GOCHA Board Member

Glenoaks Canyon Homeowners Association
Post Office Box 9949
Glendale, California 91226
September 25, 2020

Mr. Erik Krause, Deputy Director, Community Development
City of Glendale, Community Development
633 E. Broadway, Room 103
Glendale, California 91206

Delivered by hand and email (EKrause@glendaleca.com)

Dear Mr Krause,

I am writing on behalf of the Glenoaks Canyon Homeowners Association (GOCHA). The mission of our organization is to preserve our unique Glenoaks Canyon environment and to foster a strong sense of community wellbeing. We also value strong alliances with adjacent neighborhoods and act in our common interest. The GOCHA Scholl Canyon Landfill (SCLF) Work Group has prepared extensive comments on the draft environmental impact report (DEIR) for the Biogas Renewable Generation Project ("Project" or "Biogas Project") proposed for the Scholl Canyon Landfill (SCLF). The full record of the Work Group's comments follows in Attachment A of this letter.

L110-2

The Work Group found three main themes that cut across several environmental factors:

L110-3

1. **The DEIR is short-sighted. It reviews the Project from an overly narrow perspective and does not give a comprehensive report of the Project's past, current, and long term effects or identify the cumulative impacts of related projects.**

The DEIR limits the impacts of the Project to a geographical area no larger than the 2.2 acre plot on which the Project would sit, to a community that includes only a few houses within a mile of the site, and a time frame little beyond the present. In reality, however, the Biogas Project would serve a 535 acre REGIONAL municipal waste facility surrounded by densely populated, well-established communities that have been there long before the landfill. For decades, SCLF has also been generating electricity through the Grayson Power Plant. The DEIR fails to recognize this broader perspective.

L110-4

The report sorely lacks evidence that the City has clear plans for the future of the landfill, which is expected to reach its fill limit within the next ten years and will continue to produce diminishing levels of landfill gas for many decades after final cover is in place. Although the City will assume full responsibility for maintenance and operating costs for 30 years beyond closure, the DEIR is silent on how reduced organic waste and lower levels of landfill gas will impact the Project's methane-to-electricity plans. It is also not clear how closure will affect the Glendale General Plan's consistent claim that the landfill will revert to recreational use. Will gas scrubbing and power plant equipment fit the aesthetics of a recreation area? A landfill that the city might consider a resource today could grow into an expensive liability in the future.

L110-5

The DEIR disregards the connection with the Grayson Power Plant. Methane produced at the landfill was used to generate power at Grayson. Nevertheless, the DEIR does not specify, as it is required to do under CEQA guidelines, how changes in one facility will have or, as in this case, are having an impact on the other. When the pipeline between the facilities was sealed in April 2018 due to unhealthy emissions, methane processing changed immediately. Power generation slowed at Grayson and gas had to be flared full time at Scholl. The link was obvious.

L110-6

After the Grayson Repowering project fell through, it became clear that "retiring" equipment at Grayson and creating a Biogas Renewable Generation meant moving the least environmentally sound functions of the power plant to Scholl and to "start fresh" at the Grayson site. But plans for Grayson are still in flux, making it difficult to know which alternatives are truly open for landfill gas processing. Can some functions take place at

L110-7

L110-7 Scholl and others at Grayson? Will there be natural gas processing equipment at Grayson? Could landfill gas be scrubbed to natural gas quality and used at Grayson? Again, there appear to be more questions than answers about impacts.

L110-8 **2. The descriptions and justifications in the DEIR often lack specificity or accuracy so reliable conclusions cannot be drawn about whether an impact is significant or not.**

L110-9 Many sections were not updated from the MND, leading to errors. For example, gas flow is reported to be 5,000 sfm. It has not been that low since 2016. In 2020, the gas flow is closer to 6000 - 6200 sfm, a significant difference when making decisions about the capacity of engines to buy or how much excess gas will require flaring.

L110-10 **3. Insufficient or unreliable information is presented, so it is difficult to draw valid conclusions or make valid comparisons among alternatives and the Project.**

L110-11 For example, four alternatives are loosely compared using a ranking rubric of more, less, or the same. What is the difference between less and much less? How about somewhat the same and exactly the same? Are they the same? Evaluating alternatives is a primary requirement of this DEIR, but the report does not present a detailed, quantitative rubric that allows reliable comparisons.

L110-12 The air quality consulting firm, Soil, Water, Air Protection Enterprise (SWAPE), reviewed the Air Quality and Alternatives sections of the DEIR for GOCHA . (See Attachment B for SWAPE's comment letter.) SWAPE found the Alternatives analysis to be inadequate. However, they also concluded, "Alternative 2 is most protective of the environment and surrounding community compared to the proposed Project. … Despite the DEIR's inadequate evaluation of the respective Alternatives' emissions, Alternative 2 eliminates the potential for wildfire risks and emissions of TACs, including dioxins, associated with the proposed Project" (Rosenfeld and Hagemann, 2020. p. 2).

The DEIR overlooked other feasible alternatives. For example, SWAPE also recommended another environmentally preferable alternative to the Project. Internal combustion engines that burn biogas often create dioxins. SWAPE simply recommended that if using internal combustion engines, the Project should include a secondary scrubbing system to eliminate precursors of dioxins and other TACs.

L110-13

Protecting community and environmental welfare does not appear to have been a main criterion for selecting the Project rather than another alternative. The Project includes internal combustion engines with emissions well above SCAQMD limits; it is sited on a 60 year-old landfill with no liner and on unstable ground near two major earthquake faults (Verdugo and Raymond); it is in an extremely high fire zone, closely surrounded by well-established high density residential communities, at the intersection of three major freeways, with only a single access road to the landfill, and a new above-ground natural gas line; major electrical high tension lines cross the area; and all of this is incongruously zoned special recreation and residential. What long--range planning led to this decision?

L110-14

If a Project goal had been to identify the most environmentally sound alternative to derive energy from landfill gas, the DEIR would have analyzed the Alternatives section much more thoroughly so that real comparisons appropriate for the specific situation and conditions of SCLF in Glendale could be made. The DEIR does not present evidence that a detailed comparison among alternatives was made prior to selecting internal combustion engines and locating the Project on the landfill. The Biogas plant configuration appears to be much the same as it had been at Grayson. Over time, the Grayson situation resulted in serious air quality problems.

L110-15

The DEIR provides a table that presents an extensive list of various gas processing systems in California, but the report does not evaluate any of those systems as they would apply specifically to Glendale's situation with landfill gas and an aging power plant.

A Brief Outline of the SCLF Work Group's Main Comments and Questions

L110-16 Please refer to Attachment A for the full discussion of comments on each environmental factor. Below are only highlights of those comments.

Aesthetics: The 60,000-gallon water tank and the 40-foot tall exhaust stacks will L110-17 be visible from surrounding communities and from trails if the area does revert to a recreation area. There is no discussion of how the Project will affect aesthetics as the landfill closes.

Air Quality: Pollutants will exceed the SCAQMD thresholds for four contaminants, but there is no discussion of mitigation or using the best available control L110-18 technology (BACT). There is no guarantee that GWP will receive priority reserve credits to offset pollutants. Even with the offsets, pollutants will continue to exist in the real world.

Biological Resources: The report fails to report on many key species. The hills L110-19 serve as a wildlife corridor which could be disrupted by the Project, especially by the noise the equipment would create.

Energy: The Project will utilize energy that would otherwise be flared, but other L110-20 alternatives may utilize the gas with less impact on the environment.

Geology and soils: The Project site is less than a mile from earthquake faults, on one of the few relatively undisturbed areas of the landfill, atop a mountain where L110-21 seismic waves can be amplified four or five times those of field waves. Cumulative threats of earthquake and fire are not mitigated.

Greenhouse Gases: The GHG numbers in DEIR Section 4.6 are inconsistent with those in DEIR Appendix F. Valid conclusions cannot be made from these numbers. Using L110-22 data from Appendix F and the baseline flare measures from Section 4.6, the GHG emissions may increase substantially above the threshold of 10,000 metric tons of carbon dioxide equivalent per year.

Hazards and Hazardous Materials: This section does not include the impacts of earthquake or fire on the listed hazards, such as lube oil and waste oil tanks, ammonia, and the above-ground natural gas line. L110-23

Hydrology and Water Quality: The landfill is unlined; therefore, The Project must ensure that oil and other contaminants are contained to protect groundwater. The current monitors cannot assure that there will be no release and migration of hazardous materials. More monitors are needed. L110-24

Land Use and Planning: The landfill operates under a 1978 Variance from the Special Recreation zoning use that applies to the entire area. Residential zones encircle the facility. These designations reflect the long-held intent in the Glendale General Plan that the entire area will revert to recreation use as the landfill closes. The fill limit is expected to be reached by 2030. The Project requires a Conditional Use Permit to build a power plant, and residents in surrounding areas strongly oppose opening a door to further industrialization. There is no evidence of long-term land use planning for the landfill, despite inevitable closure. L110-25

Noise: The chosen engines put out sound in very low frequencies 24/7. The DEIR does not measure hearing levels low enough to determine their detrimental effects on humans or wildlife. The data was much too limited to draw valid conclusions. It was collected from six houses, twice a day for fifteen minutes, on a single day five years ago. L110-26

Transportation: The DEIR underestimates the Project's impact on transportation by not including increased traffic on Glenoaks Boulevard during construction, by not addressing Colorado Boulevard at all, and by accepting as adequate, a failing measure of traffic on the intersection of Figueroa Boulevard and SR134. L110-27

Utilities and Service Systems: The DEIR does not present a full discussion of the new gas line. Why is it above ground, and how will it be protected from fire or earthquake? L110-28

Wildfire: Wildfire is a huge risk to Glenoaks and Chevy Chase Canyons, Linda Vista, and Eagle Rock because they are located in a Very High Fire Hazard Severity Zone. The neighborhoods are limited by narrow, single-access roads. The DEIR minimizes the L110-29

danger and proposes insufficient mitigation: an on-site water tank and a fire department that is five miles away. L110-29

Given these findings, GOCHA recommends that the DEIR be revised to remedy its deficiencies and that alternatives to the project be more thoroughly reviewed, in particular, Alternative 2 which would avoid many of the environmental impacts of the Project and would allow flexibility in how renewable natural gas could be used. L110-30

Sincerely,

Rick Marquis
President

Attachment A: "Comments on the Draft Environmental Impact Report for the Biogas Renewable Generation Project, September 30, 2020"
Attachment B: Comment Letter on the Biogas Renewable Generation Project

L110-A

Attachment A

Comments on the Draft Environmental Impact Report for the Biogas Renewable Generation Project

Glenoaks Canyon SCLF Work Group

September 30, 2020

Glenoaks Canyon Homeowners Association SCLF Work Group:

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Comments on the Draft Environmental Impact Report
for the Biogas Renewable Generation Project,
Glenoaks Canyon SCLF Work Group
September 30, 2020

Aesthetics:

L110-A-1 **The 60,000-gallon water tank and the 40-foot-tall exhaust stacks will be visible from surrounding residential neighborhoods and will likely be visible from trails if the area reverts to a recreation area.**

- Ridgelines: Scenic ridgelines are at risk. The report notes (DEIR 4.1.1.1) that "the Verdugo Mountains and the San Rafael Hills are the most significant physical landmarks in the community." They create a dominant visual and physical resource that can be seen not only throughout Glendale, but also from points in Eagle Rock, Los Angeles, and Pasadena. The existing LFG collection facility and flares as well as the proposed LFG power generation facility would lie **just north of a designated primary ridgeline**. The proposed **water tank would be located on a primary ridgeline.** The water tank and four 40-foot exhaust stacks would mar the view of the ridgeline from surrounding neighborhoods, particularly from residential and recreational areas where, according to the FHWA (2015) there is "high sensitivity to visual changes" (DEIR 4.14). An exemption from an otherwise restrictive Glendale Municipal Code will allow a 60,000-gallon water tank to be built. Could the tank be placed in a less conspicuous location where it would not require an exemption from the city municipal code? Technically, the facility may be in compliance with GMC, but it will remain an eyesore. It will run counter to an FHWA "intactness" criterion the DEIR uses to measure visual quality (DEIR p. 4-14). Intactness requires a landscape to be free of "encroaching elements," unattractive features that are out of place or distract from the view. The tanks and stacks will encroach on the ridgeline and will clearly be out of place.

L110-A-2

- Aesthetics after closure. A CEQA review requires an analysis of environmental effects of future actions if they are foreseeable consequences of the proposed

L110-A-3

project or if they will change the scope or effects of the proposed project. The landfill is within about ten years of closure, and the DEIR does not present even a general use plan for the site or for the Biogas Plant when the landfill reaches closure capacity. The biogas equipment's life span will carry it about 10 years beyond closure. What happens next? Will Glendale move toward fulfilling its original promise to have the landfill revert to recreational uses, or will it continue to develop a diversified waste management industry on the site as discussed in the Scholl Canyon Landfill Joint Powers Agreement? These goals appear aesthetically incompatible. If the plan is to create a recreational area, how would Goal 2 or 5 of GMC C4.1.2.3 (to "protect ridgelines from the negative impacts of development and urbanization") come into play? Will the zoning changes and variances issued to allow a biogas-to-energy industry encourage further industrialization rather than allow methane to gradually decrease over time as the landfill is prepared for closure and recreational use?

L110-A-3

- Miscellaneous questions:

1. The Line of Sight Analysis figures are too small to read, and the analysis requires a more thorough explanation. A three dimension image would more clearly demonstrate the relative heights of the project components and help determine which components might be visible from Eagle Rock or adjoining areas. Viewed from the south the site appears to be undeveloped hillside, while the landfill side on the north appears industrial.

L110-A-4

2. Although SCLF is now excluded from the Rim of the Valley Corridor Act, might its status change once the landfill is closed and if the area becomes recreational? Not knowing the future of the landfill makes informed decisions difficult.

L110-A-5

Air Quality:

L110-A-6

The Project will exceed the SCAQMD's thresholds for four contaminants, but no mitigation or best available control technology (BACT) is proposed. Instead, the

L110-A-6 **DEIR assumes that GWP will be granted Priority Reserve Credits to offset the pollutants on paper although not in reality. Air Quality measurements are made from monitors miles from the landfill. The DEIR does not discuss carcinogenic pollutants such as dioxins and furans.**

Pollution cannot be "mitigated" with Priority Reserve Offset Allocations.

L110-A-7
- Paper offsets do not reduce pollution or health threats.The DEIR data clearly show that the power plant will emit NOx, CO, VOC, and P.M 2.5 above the SCAQMD thresholds. Projections show that air pollutants associated with the Project are worse than those resulting from the current full-time flaring and even worse when compared to new flares.

L110-A-8
- The DEIR implies that receiving Priority Reserve Credits is a certainty. However, GWP must apply for the credits, and SCAQMD may note that power generation was simply relocated from Grayson to Scholl. The reasoning to support GWP's expectation of Reserve Credit allocation is unclear.

The DEIR offers no mitigation plans for air contaminants.

L110-A-9
- Air pollutants, including particulate matter (P M2.5 and PM 10), oxides of Nitrogen (NOx), and an estimated daily release of 900 pounds of carbon monoxide, all have a negative impact on public health.

L110-A-10
- Toxic Air Contaminants (TACs) such as benzene trichloroethylene and volatile organic compounds (VOC's) should be disposed of to the extent it is technically possible. (See SWAPE comment letter in Attachment B.)

L110-A-11
- The DEIR repeatedly mentions an intent to use BACT or that emissions were "calculated based upon SCAQMD BACT standards." However, it does not specify what the standards are or how they will be applied. BACT can be complicated and require a combination of methods. At a minimum, the DEIR should explain the assumptions it makes about which BACT would have what effect. The data for BACT emissions in this DEIR are the same as those reported two years ago in the MND for this project. Have there been any BACT improvements since there?

L110-A-12 Toxic products of incomplete combustion are not discussed.
- The report contains no discussion of the release of products of incomplete combustion other than carbon monoxide, such as dioxins and furans. Dioxins are

highly persistent toxic compounds that persist in the food chain and environment. Burning solid waste is one of the most prominent sources of dioxins. Why were these substances omitted from the analysis? (See SWAPE comments in Attachment B.)

L110-A-12

There is no air quality monitoring for nearby neighborhoods.

- Analyses of ambient air quality were based on data from stations four and six miles from the landfill. Tens of thousands of Glendale, Pasadena, and Los Angeles residents live within those four and six miles. Therefore, air quality analysis should be done by monitoring stations near the proposed project site. Could air quality analyses be conducted for local neighborhoods using monitoring stations instead of using computer models?

L110-A-13

Best practices should be specified for disposing contaminants removed at various stages of landfill gas treatment.

- At stage one, condensate and particulates are removed and the gas is cooled and compressed, and at stage two, siloxanes, sulfur, NMOC's may be removed. How are the pollutants disposed? What happens to pollutants captured by the catalyst?

L110-A-14

Use of air quality measurements during full-time flaring period was flawed.

- AQMD data from 2018 when flares were used about eight months was not an accurate measure. The flares were used 100 percent of the time in 2019.

L110-A-15

Biological Resources:

The Report grossly under-reports biological impacts. Key species are missing from the assessment. The hills serve as a wildlife corridor which could be disrupted by the Project.

L110-A-16

- 3.1.2 The Surrounding Uses section does not include the baseball field and golf course built on reclaimed landfill nor the parks and daycare facility located in Eagle Rock.

L110-A-17

- 4.3.1.1 Biological data was collected on one day per calendar quarter and does not accurately represent the breadth of plant and animal diversity.

L110-A-18

- L110-A-19 4.3.1.3 The Habitat Assessment and Biological Surveys were incomplete with data collected on very few days and not at night when nocturnal animals (bats, owls, bears, mountain lions, etc.) are most active.
- L110-A-20 Page 4.117 Noticeably absent from the list of birds was the huge flock of seagulls that are normally present at the landfill. Many species of raptors are also missing.
- L110-A-21 Page 4.117-8 Only four mammals are listed: ground squirrels, cottontail rabbits, opossums, and raccoons. Residents have often seen "top tier" mammals as well: bobcats, mountain lions, bears, coyote, and foxes. The survey did not detect bats, but residents see then almost nightly.
- L110-A-22 Page 4.132 Threatened, Endangered, or Special Status Birds: California gnatcatchers are present in the area. They did not disappear 20 years ago as the report states. Eagles and turkey buzzards come to the area to dine on carrion.
- L110-A-23 Page 4.135 American peregrine falcon are present and hunt over the Project area. They are not 10 miles away and absent for 20 years as the report suggests.
- L110-A-24 Page 4.137 A variety of bats have roosts in the areas adjacent to the BSA and forage for food over the BSA.
- L110-A-25 Wildlife Corridors and Special Linkages: The forest rangers in the area describe the BSA as part of the wildlife corridor that links the Santa Monica Mountains and the San Gabriel Mountains which function as an "island" of native habitat between heavily developed areas.Top tier predators are essential to maintaining the natural balance of wildlife in the area, and further industrialization would repel them.
- L110-A-26 4.3.2.5. Local Environmental Impact Analysis - Goal 2: The proposed gas processing equipment and power plant do not ensure protection of the ridgelines, canyons, and streams. Table 25 indicates that plant diversity would be reduced due to the bioacoustics on the proposed Project, and noise would have an adverse effect on animal activity as well. Birds use song to attract mates, and bats use echolocation to find food. Noise would greatly reduce the presence of animals that spread seeds, including deer and other animals that range over the area, leaving scat which re-seeds and fertilizes plants.

Energy:

The Project will utilize the energy that is currently being flared. However, alternatives may utilize the energy with fewer negative environmental impacts.

L110-A-27 • The Project will generate energy, but compared to Alternative 4, where gas is burned in engines at another site (Grayson), the improved energy is marginal, at best and possibly worse due to high energy costs during construction and the use of natural gas to supplement the Project's engines. There may be more employees operating the power plant with new equipment than are currently operating the flares.

Geology and Soils:

L110-A-28 **Scholl Canyon is a 60-year-old municipal waste facility located on highly fractured, shattered bedrock. It is vulnerable to fire and earthquakes.**

L110-A-29 • There is very little undisturbed land on the landfill, and the Project would sit atop a mountain within 10 miles of six active faults. The Verdugo fault is about 0.3 miles away, and three others are less than five miles from the Project. All six have a magnitude maximum estimate of 6.7 to 7.2 (2008 National Seismic Hazards maps, USGS, 2008).

L110-A-30 • Seismic waves on a mountain can be amplified four or five times those of field waves. What mitigation would prevent gas and water line breaks, water or ammonia tank ruptures, slides on exposed faces of the landfill, or liquefaction at Scholl Canyon Park? The Project MND stated, "Landslide hazard zones are most likely on the steep slopes upon which Scholl Canyon Road is located." No mitigation is offered to protect landfill customers and emergency responders on that road during an earthquake or fire emergency.

Greenhouse Gas Emissions:

L110-A-31 **In Section 4.6, the GHG numbers are inconsistent with the numbers in Appendix F. Using Appendix F and the baseline flare numbers from Section 4.6 indicates that the GHG emissions may increase more than the significance threshold of 10,000**

L110-A-31 **metric tons of carbon dioxide equivalent per year. We have no idea where the proposed project numbers in Section 4.6 come from.**

- The section 4.6 on GHG emissions states that the baseline scenario of flaring produces 43,621 metric tons of CO2e per year and that the proposed plant operation will produce a Total of 48,427 metric tons CO2e per year. Thus, the DEIR

L110-A-32 claims that there is a net increase of only 4,806 metric tons per year, which is below the SCAQMD significance threshold of 10,000 metric tons of CO2e per year (for an industrial project). Therefore, the DEIR concludes that no mitigation measures are needed.

- A question arises because the emissions for the project in Section 4.6 and its corresponding Appendix F (same as MND section F) are not in agreement. While section 4.6 assumes GHG emissions of 48,427 metric tons of CO2e per year for the new power plant, the corresponding Appendix F (Greenhouse Gas Emission

L110-A-33 Inventory) actually projects emissions of 57,467 CO2e (57,222 for operation and 246 for occupants), a substantially higher number. The difference between the new project and the baseline would be 13,846 metric tons, <u>above</u> the SCAQMD threshold.

- This discrepancy might be explained from an estimated maintenance and repair downtime of 15.4% (1-48,427/57,222), which is not mentioned in section 4.6 or Appendix F. However, during such downtime, flares would serve as backup devices

L110-A-34 as explained in the section — which we know create similar amounts of GHG — 90% as much (43,621/48/427). Thus, we cannot reach the projected 48,427 metric tons in section 4.6 from 57,467 metric tons in Appendix F just through downtime.

- In addition, if run-time or some other effect is creating this difference, then one

L110-A-35 would think that the air quality numbers would also differ from the MND numbers, but they do not.

- Please explain the differences of these numbers in detail.

- The total gas flow rate is also different than assumed. Recent flow rate of landfill gas is 6000 scfm rather than the 5000 used in the DEIR. The engines cannot handle this

L110-A-36 much gas, so some will have to be flared at all times. The flare numbers may also be different than assumed, so this section might be significantly underestimating GHG.

Hazards and Hazardous Materials:

L110-A-37 **Hazards need to include the effect of earthquakes and fire on the hazards listed, such as lube oil and waste oil tanks, ammonia, and the natural gas line.**

L110-A-38 • Elderly care facilities and child care centers in Eagle Rock and Pasadena are much closer than the five to eight miles as stated in the section.

L110-A-39 • Even watered plants tend to burn in an intense fire.

L110-A-40 • The nearest fire station is in L.A., not Glendale.

L110-A-41 • Hazards during construction include: re-piping for landfill gas and possibly release of landfill gas or fugitive gas.

L110-A-42 • Hazards during operation are significant, especially in a fire and earthquake-prone area and include: oil tanks, ammonia barrels, above-ground natural gas line, sulfur filters, siloxane disposal, ground flare, pipes carrying gas to the engines.

Hydrology and Water Quality:

L110-A-43 **The landfill is unlined. Therefore, the proposed project must ensure that oil and other contaminants are contained to protect the groundwater. In addition, more groundwater monitoring needs to be done to assure no release and migration of hazardous materials.**

L110-A-44 • There are currently an insufficient number of groundwater monitoring wells downgradient of the barrier to effectively monitor contaminants that migrate off-site. Monitoring wells MW17A and MW-18A are dry, so only one monitoring well (MW-18B) is monitoring the migration of offsite contaminants. There should be a plan to install additional groundwater monitoring wells in Scholl Canyon.

L110-A-45 • Groundwater in monitoring wells M02B, M06B, and M08B (which are downgradient of Barrier 1) exceed regulatory levels for Per-and Polyfluoroalkyl Substances (PFAS), indicating that the on-site groundwater extraction wells are not meeting the remedial objectives to minimize downgradient migration of contaminants.

L110-A-46 • Will the proposed project contribute to PFAS contamination to groundwater? What is currently being done to remediate groundwater that is impacted with PFAS

L110-A-46 downgradient of Barrier 1? There are also detections of PFAS at off-site monitoring wells within the Scholl Canyon neighborhood (MW-18B).

- L110-A-47 The landfill is unlined and the geology beneath the landfill is fractured bedrock. Contaminants can leach into fractured bedrock and migrate beneath Barrier 1 and impact downgradient residential areas. Is there a plan to monitor contaminants in fractured bedrock?
- L110-A-48 Groundwater monitoring wells should be installed on-site around the proposed project site to monitor potential releases from the construction and operations phases before contaminants can impact fracture bedrock.
- L110-A-49 What source of water will be used for dust suppression? Will it be analyzed prior to use to confirm that there are no contaminants above regulatory levels?
- L110-A-50 What type of secondary containment will be used for the 2,000-gallon lube oil storage tank and the 3,000-gallon waste storage tank? How will storm water within the secondary containment be disposed of after a storm event?
- L110-A-51 Waste oil should only be stored in a hazardous waste compound. Section 4.7.4.2 states that waste oil contained in 55-gallon barrels will be located throughout the site.
- L110-A-52 Figure 2.3.3 does not show the locations of the 2,000-gallon lube oil storage tank, the 3,000-gallon waste storage tank, or the hazardous waste compound. Where will these tanks and the compound be located within the project area?

Land Use and Planning:

- L110-A-53 The Scholl Canyon Landfill exists under the conditions of a Joint Powers Agreement (October 7, 1997) among the City of Glendale, Los Angeles County, and the County Sanitation District No. 2 of Los Angeles County. The 5 parcels upon which the Biogas Project will be located are owned by the City and Los Angeles County. The Sanitation District operates the landfill. Southern California Edison has also granted the landfill a right-of-way beneath their power lines.
- L110-A-54 The multiple jurisdictions raise questions about responsibility. Which entity, the City or the Sanitation District, will be responsible for the Biogas Plant operation? Has the City acquired consent of The County of Los Angeles before locating the Project on a

L110-A-54 parcel owned by the County? Has the City obtained consent, as required by the Joint Powers Agreement, that the Project will not interfere with the District's landfill functions? Exactly how will the Project interface with the SoCal Edison property?

L110-A-55
- The DEIR under-reports adjacent land use. Residential areas lie to the northwest, south, east and west of the project site, not just to the west as stated in section 4.9.1.1. Within a two mile radius of the project are 16 schools, 4 golf courses, 3 health facilities, the Rose Bowl, 4 parks, Kidspace Museum, and retirement and extended care facilities.

L110-A-56
- Sections 4.9.2 does not explain the specific conditions or situations that would justify a CUP for the Biogas Project or how the Project relates to the Glendale General Plan. (In part 4.9.2.1, the Code of Federal Regulations Title 49 should be Part 172, not 192.)

L110-A-57
- The landfill is zoned Special Recreation (SR), and the proposed gas line will cross Restricted Residential (R1-R) parcels. The Glendale Use Variance (case Number 6669-U, November 27, 1978) allows the operation of a landfilling business. One condition of the Variance is that "any … energy recovery activity be subject to prior approval of the Zoning Administrator." Therefore, the Biogas Power Plant must be approved for a Conditional Use Permit (CUP). The Glendale Municipal Code Chapter 30.42.030 specifies that a CUP can be granted **only** if specific conditions apply:

1. The proposed use must be consistent with elements and objectives of the Glendale General Plan (GGP 1986).

The General Plan has consistently designated the Verdugo Hills and surrounding area as Recreational or Residential. The landfill has always been an exception to the plan. The 1978 Variance is "for landfill operations leading to an eventual regional park." The Recreation Element of the GGP supports this original intent. "The City shall be the lead agency in regional recreational planning and programs aimed at developing regional park facilities in the Verdugo Mountains…" (GGP 1975, p. 5). Further, "When Scholl Canyon sanitary landfill has reached capacity, the remaining 250-280 acres … will become available for park improvements and open space" (GGP 1975, p. 8).

The planning documents make no mention of an ever-expanding, ongoing waste management or electrical power industry on Scholl.

2. The proposed use and its associated structures and facilities may not be detrimental to the public health or safety, the general welfare, or the environment (GGP 1986).

The comments in this Work Group's DEIR review indicate that the power plant will be detrimental to public health and safety, especially with regard to air quality, noise, geology and soils, hazards and wildfire. It will sit on one of the very few undisturbed plots on the landfill. The General Plan specifies, "Critical facilities, including power plants and major electrical equipment should not be constructed in seismic zones IB, IC, IIB (which are all located on Scholl Landfill)… and land use controls may be established for those zones" (GGP 1986, p. 37). The Plan also opposes conditional permits in situations where "the effects of a combination of individual natural hazards results in a high level of overall hazards." The Project would be processing highly flammable methane three tenths of a mile from the Verdugo fault, in a high fire danger zone within yards of high tension electrical towers.

L110-A-57

3. The proposed use and facility may not adversely affect or conflict with adjacent uses or impede the normal development of surrounding property.

The DEIR does not present a forecast for the future of the Biogas Plant or the landfill. At the current fill rate, the landfill is expected to meet its capacity by about 2030. Plans should be for decreasing rather than increasing methane production. How will allowing another element of industrialization to the area prepare for closure and future uses? The 1978 Variance also specifies, "That upon completion of the landfill operation all equipment and structures not used for park purposes be removed from the site." Will the Conditional Use Permit provide the same requirement? What will happen to the new gas and water lines?

Landfills are forever. They cannot be removed or rebuilt or easily repurposed. In this case, the City took two canyons and created a 1,400 foot high mountain

L110-A-57

of trash. How will adding a power plant make the area more compatible with residential and recreational uses?

Noise:

L110-A-58

The proposed biogas power plant will add a permanent increase in ambient noise levels in the vicinity, above levels existing without the project. The draft report does not adequately analyze that increase and declares it to be insignificant.

L110-A-59

- To process landfill gas into electricity, the project includes "compressors, coolers, pumps, exhaust fans, exhaust stacks and louvers, and four reciprocating internal combustion General Electric engines" (p. 4.251). The report's Appendix J presents a table: "PWL Summary - 4 x Jenbacher J620 GS-16: Levels at Octave Band Center Frequencies (Hz) / PWL." The table specifies 14 pieces of major equipment and their assumed noise levels, each between 99 dBA and 115 dBA. This is very loud. In everyday language, it is like driving a snowmobile, attending a rock concert, or listening to an ambulance siren**.**

L110-A-60

- The "PWL Summary Table" reveals another serious problem. The equipment specifications show most of the sound is very low in the frequency spectrum. This kind of sound is chronically annoying and harmful over time. However, the table only goes down to 31.5hz and ignores sound below that level even though human hearing goes down to about 20hz, and people can feel even lower frequencies as vibrations in their bodies. The table shows that the sound goes up in levels as it goes down in frequency. Logically, the level would continue to go up below 20hz. This is the kind of sound that makes people ill and, at the least, feel anxious. The equipment specifications and the table should show noise emission levels down to 0hz. This information would also allow a more convincing analysis of ground vibration from sound below about 20hz.

L110-A-61

- The report does not adequately take into account the unusual context of the project's site. The facility will be built above SR134, at the top of a mountain, behind ridges, uphill and adjacent to canyons, on the edge of an ever-changing municipal landfill, yards from the heavily trafficked landfill entrance which serves about 650 trucks per day, and surrounded by residential neighborhoods. All of these conditions could influence noise levels. The report claims that the CadnaA modeling software

takes into consideration conditions such as terrain, wind, ground condition, and barrier effects." However, the study **does not specify** exactly which relevant conditions of the Scholl Landfill site were entered into the model. Are any receptors behind berms? In a canyon? At the top of a mountain? Behind a ridge? The length of the sound waves at the lower end are very long, so it is difficult to predict how the terrain and other surrounding conditions affect the sound. What is more, the data is five years old, and landfills change considerably in five years.

L110-A-61

- The study's design is flawed. Conclusions are derived from data collected on a single day, October 15, 2015, from six houses, "sensitive receptors", within about 1/2 a mile of the landfill. Each sensitive receptor was visited once in the morning and once in the evening for 15 minutes per visit. Although other measures were collected, only the Leq, the Equivalent Noise Level, measure served as a baseline ambient noise for all comparisons in the study. Table 33 claims that the Leq "is usually measured in hourly intervals over long periods in order to develop 24-hour noise levels" (4.242). This comprehensive data collection was not done in this study; therefore conclusions based on the Leq may not be valid. Generalizations can only be made to six houses, 1/2 a mile from the project site in the morning or evening of October 15, 2015.

L110-A-62

- Other potential sensitive receptors were ignored. For example, measures were not taken for the building which will house the Sanitation District office immediately adjacent to the power station. The sample does not consider the landfill business itself, the weighing station where trucks sit idling or any of the activities that take place on the tipping floor. The sample does not include locations where large groups gather such as the golf and tennis club, Cal Arts, and Dahlia School and Recreation Center. All lie within the same distance from the project as the six selected receptors. No explanation was given for their exclusion.

L110-A-63

- Whether it meets Glendale's violation criterion for noise (ambient noise plus 5) or not, this equipment operating 24 hours a day would add to the already substantial noise at the site.

L110-A-64

- The report is also missing specific noise abatement measures in the structures that house the generators. This is critical as vibration from the equipment will transfer to

L110-A-65

L110-A-65 the building and radiate. Properly designed and installed housing can mitigate the impacts.

Transportation:

L110-A-66 **The DEIR's definitions of "the existing roadway system" and "the vicinity" are too restrictive. They underestimate the Project's impacts on transportation.**

- L110-A-67 The Biogas power plant will sit on a rare spot of undisturbed ground on Scholl Canyon Landfill. The Project's efficacy will depend upon the quantity and quality of landfill gas produced by this approximately 500 acre, class III municipal solid waste facility, Transportation along roadways around the Project are determined by the unique characteristics of the landfill and its disturbed ground.
- L110-A-68 The DEIR does not describe the air polluting characteristics of vehicles that travel to and from the landfill. Approximately 650 trucks a day, from large commercial dump trucks to pick-ups, travel slowly up the steep, narrow Scholl Canyon Road carrying heavy loads. Will the majority of construction and maintenance vehicles that serve the Project also be trucks? Do the report's level of service (LOS) measures take into account the passenger car equivalence of trucks?
- L110-A-69 Although the biogas facility will be built within the City of Glendale, the report limits its analysis to "roadways relevant to the proposed Project within the City of Los Angeles" (4.259). The report narrows its perspective even more to focus primarily on the intersection of SR134 and Figueroa Boulevard which joins Scholl Canyon Road, the landfill's access road. A more accurate and inclusive perspective of the project's impacts would include State Route 2 and at least two local streets, Colorado Boulevard and Glenoaks Boulevard as well as the entrance and exit ramps that serve these critically important roadways.
- L110-A-70 The report focuses almost exclusively on levels of service along along the Figueroa Street and SR134 ramps. Although the report concludes there would be no significant impact on transportation either during the Project's construction or operation, Table 46 may not confirm that conclusion. It shows the peak morning hour measures of Control Delay to be F for the westbound Figueroa Street ramps and C

for the westbound evening peak hours. The data on Tables 46 and 47 raise a number of questions:

- How will additional construction vehicles for 18 months not impact an already failing level of service?
- Do the tables take into account the peak hours of waste hauling to the landfill, or are these measures of regular commuter traffic along the busy 134?
- Using the average number of trips per hour over 8 days does not appear to be a useful metric, especially to describe traffic on a commercial roadway such as Figueroa and the134 where travel peaks in the mornings and evenings when people drive to and from work.

L110-A-70

- The regional transportation network that may be impacted by the Project not only includes State Route 134, an east-west urban principal arterial that runs directly south of the Project, but also State Route 2, which runs north and south directly west of the Project. Northbound traffic on SR2 may avoid the Figueroa exit on SR134 by exiting on Colorado Boulevard, a local street which runs east and west through a residential and light commercial neighborhood in Eagle Rock. Colorado Boulevard intersects Figueroa at SR134. Garbage trucks and construction vehicles regularly use Colorado as a main surface street in order to bypass the busy Figueroa and SR134 intersections. Eagle Rock residents and businesses regularly complain about the garbage truck traffic on Colorado. How would additional construction traffic for the Project affect traffic along that local main street?

L110-A-71

- Glenoaks Boulevard, is the only access for construction and maintenance vehicles on the west side of the landfill, yet this street was not included in the Project DEIR. This residential, two-lane street intersects SR2 and is the only roadway in and out of Glenoaks Canyon. It runs through the canyon and ends at the Scholl Canyon Recreation Area and Golf Course. There are no reliable public roadways around the north of the landfill to connect Scholl Canyon Road and Glenoaks Boulevard. Both are one way in and one way out streets. The Project's new water line will be built from the golf course on Glenoaks Boulevard across the landfill to the Project's main structures. The proposed natural gas line will also be built using Glenoaks Boulevard

L110-A-72

as an access. The DEIR does not mention the impact of construction or service vehicles on Glenoaks Boulevard. L110-A-72

- CEQA regulations require mitigation if a project impacts transportation in a way that would result in inadequate emergency access. The potential for fire at the Project site is high. The power plant will sit on the Verdugo Fault in a Very High Fire Hazard Severity Zone. The equipment, four internal combustion engines and 12 flares, must be meticulously maintained to avoid fire. In addition, Cal Edison's main power transmission lines stand across the landfill near the Project. A major fire or earthquake in the vicinity could block access via single-lane streets, Scholl Canyon Road and Glenoaks Boulevard. In 2019, a fire at the junction of SR134 and SR2, about a mile from the Project site, caused all east-west and north-south traffic to be blocked and closed, and the exit route from Glenoaks Canyon was closed. How will the Project ensure that first responders will have easy access to the high fire zone and that residents will have alternate exit routes? L110-A-73

Utilities and Service Systems:

- What procedures are in place if storm water or wastewater does not meet either the sanitation district discharge limits or the NPDES discharge limits?
- Why does Section 4.13 not include a discussion of the proposed 3500-foot natural gas line? Will the 3500-foot line be double-walled? How will the natural gas line be secured above ground? What fire safety procedures have been put in place for the gas line? Why its the planned gas line not to be underground in compliance with the Glendale General Plan Policy PS/F6.6? L110-A-74

Wildfire:

Wildfire is a huge risk to Glenoaks and Chevy Chase Canyons, Linda Vista, and Eagle Rock which exist in a designated Very High Fire Hazard Severity Zone ("VHFHSZ"), a Cal Fire designation for areas most at risk for fires in the State. (p. 4.266) These neighborhoods all have narrow, single-access roads. The DEIR minimizes the danger and proposes insufficient mitigation: an on-site water tank and a fire department more than five miles away. L110-A-75

L110-A-76
- Topography: (p.4.14.1.1) Fire suppression from the ground is difficult because of the steep and uneven terrain.The upper working face of the southwestern part of the landfill remains without landscaping and susceptible to fire and mudslides. The steep Figueroa/Scholl Canyon Road is prone to landslide during an earthquake.

L110-A-77
- Wind: (p.4.14/1.1) Winds in excess of 40 mph are common, and gusts exceeding 100 mph are possible. Such wind velocity could affect fire suppression and spread of airborne hazardous materials.

L110-A-78
- Fire and Access: The City does not enforce weed abatement regulations in the canyons generally and along public roads: Mt. Carmel, Glenoaks Boulevard, and Scholl Canyon Road (p.4.291). The canyon has a history of brush fires. One of the more recent fires, in August, 2019, occurred at the mouth of the canyon, threatening to cut off Glenoaks Boulevard, the only route in and out of a canyon with 750 homes, recreation facilities, and two parks.

L110-A-79
- The Project would contribute to evacuation problems. The proposed exit, Scholl Canyon Road, feeds into an already overburdened Glenoaks Boulevard (p. 4.14.3.2). This narrow road would have to handle ongoing emergency traffic from the 750 homes and parks in the canyons. Lower Scholl Park has 43 marked parking spaces, and Glenoaks Park has about 45 parking spaces around its one-block perimeter. The Scholl Recreation Center has 8 tennis courts, an 18-hole golf course, a driving range, 102 marked parking spaces, and baseball fields with 62 marked parking spaces. Personnel and vehicles from the Project may also funnel through the narrow road which would also have to accommodate emergency vehicles. Glenoaks has cars parked along both sides of the street, further aggravating emergency vehicles, especially with panicked drivers trying to escape. There is no defensible space in Glenoaks Canyon. The former fire road from the north edge of the landfill into Chevy Chase Canyon has been destroyed.

L110-A-80
- Glenoaks Elementary School also creates traffic problems for the narrow Glenoaks Boulevard. Parents coming from Chevy Chase as well as from Glenoaks Canyon create serious congestion on the streets near the mouth of the canyon.

L110-A-81
- The Glendale Fire Department has ceased to grade and maintain the unpaved roads around the landfill, leaving arial attack as the primary fire suppression tactic. What

L110-A-81 access roads are suitable to accommodate emergency vehicles on or near the Project site? Will the access routes be cleared regularly of brush and grasses (p. 4.214)?

- L110-A-82 Earthquake: No mention is made of earthquake danger or its effects on fire or hazardous materials dispersion. Earthquake damage to the protective enclosures of the internal combustion engines cannot be dismissed. Power lines running across the landfill pose an initial threat of fire which could ignite nearby brush in high winds (p. 4.2.88, SB1028).
- L110-A-83 Fire Suppression and Mitigation. Mitigation of the Project's threats are inadequate. The DEIR claims that the City of Glendale would be responsible for fire suppression at the Project site although the nearest fire stations are in Eagle Rock. Fire and earthquakes threaten all of the neighborhoods surrounding the landfill. What cooperative arrangements have been made among the cities' first responders to deal with incidents on or near the landfill?
- L110-A-84 "Stringent fuel modification ordinances" have not been enforced (p. 4.14.2.2).
- L110-A-85 Construction of a "small access road" through the site is not sufficient for evacuation purposes.
- L110-A-86 The DEIR summarizes the threats from fire hazards, evacuation shortcomings, flooding dangers, etc. but then cavalierly dismisses them.
- L110-A-87 What specific practices will be put in place to mitigate threat of fire from the current as well as the proposed flaring system?
- L110-A-88 Vehicle refueling must take place off-site to protect the landfill from spills and leakage. Gas and oil storage on site create fire risks and should not be permitted (p.4.210). The proposed 2000-gallon lube oil storage tank as well as the 3000-gallon waste oil tank have no place on a site subject to wildfire and earthquake.
- L110-A-89 The 12000-gallon tank of 19% aqueous ammonia could be damaged. How will surrounding neighborhoods be protected from the compound flowing downgradient or carried by the wind?

Alternatives:

There is inadequate data to compare alternatives. They are simply rated "better, same or worse" even when the effects may be small or occur only during construction. An impartial and quantitative discussion of the alternatives is needed, particularly of Alternative 2 which proposes cleaning and compressing the gas to renewable natural gas standards and injecting it into the gas company's pipeline. Distributing the gas scrubbing process between Scholl Landfill and Grayson should also be explored. There may be additional alternatives that should be considered.

L110-A-90

L110-A-91
- What is the air quality data for each of the alternatives?

L110-A-92
- What pollutants at what concentrations or amounts are produced by the various alternatives?

L110-A-93
- Quantify the GHG data for each alternative. Table 55 indicates GHG are worse for the new flares than for the Project which is inconsistent with the tables in 4.6.

L110-A-94
- Quantify the noise data for each alternative.
- There is no discussion of the equipment needed to purify the landfill gas for either Alternative 2 or 3.
    - What pollutants does the equipment remove? Does it completely remove dioxins? What are the physical dimensions ("the footprint") of the equipment? Are there pollutants or toxic chemicals needed to scrub the gas?

L110-A-95
    - The amount of air currently entrained into the landfill gas will affect the percent of methane in the gas. How will adjustments be made to the gas collection system on the landfill ("tuning") in order to obtain maximum levels of methane while maintaining safety and minimizing odor? Minimizing leaks and adjusting the vacuum to introduce less air would benefit all the alternatives.
    - All alternatives would also benefit from having the gas scrubbed to remove TACs and precursors to dioxins.

L110-A-96
- Alternative 2 states that the construction phase would be worse for air quality, greenhouse emissions, and noise. Please quantitatively compare this with construction for the proposed Project. The construction phase of Alternative 2 will be 15-18 months, but the operation of Alternative 2 will be 20+ years. Why did the DEIR

L110-a-96 not calculate the anticipated <u>combined</u> construction and operation data for each Alternative and compare them to the Project data?

- Where would further gas purification discussed in Alternative 2 take place? There is a potential danger with the existing pipeline from Scholl to Grayson if the gas were essentially pure methane at elevated pressure in the pipeline. It seems reasonable to remove nitrogen, carbon dioxide, and oxygen from the methane at Grayson. Was this process considered? If at least some gas purification takes place at Grayson, then less land is needed on Scholl.

L110-A-97

- The report needs quantitative information on the energy loss for Alternatives 2, 3, and 4. Alternative 1 gives no productive energy.

L110-A-98

- Some of the ratings in Table 55 seem strange. In particular:
  - Effects during construction should not necessarily cause ratings to be worse. Why is Alternative 2 rated worse in geology and soils? Construction near Grayson would not have a lasting effect, while impacts at Scholl are lasting.
  - Any Alternative that uses the pipeline to Grayson was rated worse in hazards. However, there are significant hazards for the project at Scholl, such as 2,000-gallon lube oil storage tank, 3,000-gallon waste oil storage tank, 12,000-gallon aqueous ammonia tank, above-ground natural gas line, and the power plant situated far from fire crews, etc. How does one decide which is more hazardous?

L110-A-99

  - Alternative 2 is rated worse in Transportation and Traffic due to construction.
  - Alternative 3 is **not** rated worse in Transportation and Traffic even though hundreds of trucks per day will refuel for 20 years, even after the landfill is closed.
  - Why are Geology and Soils and Hydrology and Water similar between Alternative 4 and the Project? Logically, wouldn't impacts be far less for Alternative 4 because there would not be any major construction at Scholl?
  - Why is Wildfire Risk for Alternative 1 rated the same as the risk for the Project? There will be no above-ground natural gas line across the landfill in Alternative 1, nor will there be internal combustion engines or oil storage tanks at the landfill. There would also be considerably less construction with Alternative 1 than with the Project.

L110-A-100

- Alternative 2 can allow one to specify the end use of the renewable natural gas (RNG). Currently, there are financial advantages for vehicle fuel. Profit from the RNG could be used to purchase solar or other real renewable power. It could be used at Grayson in an emergency or for fuel cells as that technology develops.

L110-A-101

- Flares. All of the Alternatives include flaring. NOx emissions from the flares in 2019 was 152 pounds per day, far exceeding the SCAQMD threshold of 55 pounds per day. Landfill gas flaring has been ongoing 24/7 since April 2018. Why have new flares not been installed? If new flares are a better technology than the current flares and reduce emissions, they should be installed now, regardless of the decision about the Biogas Project EIR. Even if the Project is approved, the Project will take at least 18 months to complete.

L110-B

Attachment B

Letter from Soil Water Air Protection Enterprise (SWAPE)
Comments on the Biogas Renewable Generation Project

Paul Rosenfeld and Matt Hagemann
September 24, 2020

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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September 24, 2020

Marie Freeman
Glenoaks Canyon Homeowners Association
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Subject: Comments on Biogas Renewable Generation Project (SCH No. 2017081062)

Dear Ms. Freeman,

We have reviewed the July 2020 Draft Environmental Impact Report ("DEIR") for the Biogas Renewable Generation Project ("Project") located in the City of Glendale ("City"). The Project proposes the demolition of existing facilities and the installation of a facility that would burn landfill gas ("LFG") to generate electrical power, including a natural gas pipeline, water pipeline, two water tanks, and vegetation clearance, on the 2.2-acre Project site.

L110-B-1 In an effort to inform decision-making and consider alternatives that would reduce the Project's impact on the surrounding environment, the DEIR identifies the following four (4) alternatives to the proposed Project:

- Alternative 1: No Project.
- Alternative 2: Convert the LFG to Natural Gas.
- Alternative 3: Convert LFY to Liquid Natural Gas ("LNG").
- Alternative 4: Locate Engine Generators at an Another Location.[1]

L110-B-2 Our review concludes that the DEIR's consideration of alternatives is inadequate, as it fails to consider an additional alternative including the use of scrubbers to reduce emissions, prior to the combustion of LFG to generate electrical power. As such, we recommend that an updated EIR be prepared to evaluate an *additional alternative* including the use of scrubbers, prior to LFG combustion, in order to reduce emissions associated with the Project and their impact on the surrounding environment.

[1] "Biogas Renewable Generation Project Draft Environmental Impact Report." City of Glendale, July 2020, *available at:* http://glendalebiogasgeneration.com/#draft-eir, p. 5.0-5.1.

L110-B-3 Furthermore, our review concludes that the DEIR fails to adequately evaluate the Project's health impacts associated with chlorinated dioxin ("dioxin") formation by not considering scrubbers to remove chlorinated compounds from the LFG, as chlorinated compounds can form dioxins. An updated EIR should be prepared to adequately assess and mitigate the potential health risk impacts that the project may have on the surrounding environment.

L110-B-4 Our review also concludes that Alternative 2 is most protective of the environment and the surrounding communities compared to the proposed Project and the other proposed alternatives. As such, we suggest that Alternative 2 be further considered for the proposed Project. Despite the DEIR's inadequate evaluation of the respective Alternatives' emissions, Alternative 2 eliminates the potential for wildfire risks and emissions of TACs, including dioxins, associated with the proposed Project.

L110-B-5 Lastly, we suggest that the existing LFG flares be immediately replaced to reduce TAC emissions and to comply with current South Coast Air Quality Management District ("SCAQMD") regulations until the Project is operational.

Alternatives

Failure to Identify All Feasible Alternatives

According to CEQA Guidelines § 15126.6(b):

L110-B-6

> "Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of *avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly*."

As you can see in the excerpt above, CEQA requires that projects consider alternatives that can avoid or substantially lessen any significant effects of the Project, even if the alternatives would impede project objectives or would be more costly. Here, as previously discussed, the DEIR identifies four alternatives, which include the following:

- Alternative 1: No Project.
- Alternative 2: Convert the LFG to Natural Gas.
- Alternative 3: Convert LFG to Liquid Natural Gas ("LNG").
- Alternative 4: Locate Engine Generators at an Another Location.[2]

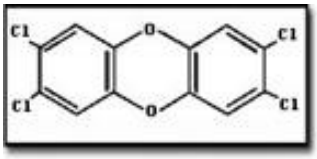
However, we find the DEIR's consideration of alternatives to Project to be inadequate for two (2) reasons. First, the DEIR fails to quantify the emissions differences between the above-listed alternatives and the proposed Project. Without such information, the DEIR does not present enough information to enable a decision maker to make reasonable judgements about with Alternative might result in the least air contaminants. Second, the above-listed alternatives fail to address the potential for use of scrubbers to reduce emissions, including emissions of reactive organic gases/volatile organic compounds ("ROG/VOC"), as well as the

[2] "Biogas Renewable Generation Project Draft Environmental Impact Report." City of Glendale, July 2020, *available at:* http://glendalebiogasgeneration.com/#draft-eir, p. 5.0-5.1.

incidence of toxic by-products.[3] As such, we recommend that an updated EIR evaluate an *additional alternative* including the use of scrubbers, prior to LFG combustion, in order to reduce emissions and their impact on the surrounding environment.

Namely, the proposed Project does not include a mitigation measure to address potential dioxin emissions from the power generation facility.[4] According to the EPA, "Dioxins are highly toxic and can cause cancer, reproductive and developmental problems, damage to the immune system, and can interfere with hormones."[5] Further, "dioxins are extremely persistent compounds and break down very slowly. In fact, a large part of current exposures to dioxins in the United States is due to releases that occurred decades ago." [6] The chemical structure of 2,3,7,8-Tetrachlorodibenzo-p-dioxin, the most studied and most toxic of all dioxins, is pasted below.

L110-B-6



[7]

Dioxins, classified as a semi-volatile organic compound ("SVOC")[8] and as a toxic air contaminant ("TAC") by the California Office of Environmental Health Hazard Assessment ("OEHHA"), are a group of chemicals that include known human carcinogens.[9] The combustion of LFG via internal combustion ("IC") engines has potential to produce dioxins.[10] According to the Project description, the proposed power generation facility will include four reciprocating

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[3] "Investigation of the Composition and Emissions of Trace Components in Landfill Gas." Parker, Dottridge, and Kelly, Environmental Agency, 2002, *available at:* https://www.gov.uk/government/organisations/environment-agency, p. 83.

[4] "Biogas Renewable Generation Project Draft Environmental Impact Report." City of Glendale, July 2020, *available at:* http://glendalebiogasgeneration.com/#draft-eir, p. 2.5-2.7.

[5] "Learn about Dioxin." U.S. Environmental Protection Agency, website, available at: https://www.epa.gov/dioxin/learn-about-dioxin.

[6] Ibid.

[7] Ibid.

[8] "Investigation of the Composition and Emissions of Trace Components in Landfill Gas." Parker, Dottridge, and Kelly, Environmental Agency, 2002, *available at:* https://www.gov.uk/government/organisations/environment-agency, p. 31.

[9] "Staff Report: Initial Statement of Reasons for Proposed Rulemaking" re: "Public Hearing to Consider the Adoption of a Regulatory Amendment Identifying Chlorinated Dioxins and Dibenzofurans as Toxic Air Contaminants." State of California Air Resources Board, 1986, *available at*: https://oehha.ca.gov/media/downloads/air/document/chlorinated20dioxins.pdf, p. 13.

[10] "Dioxin and Furan Emissions from Landfill Gas-Fired Combustion Units." County Sanitation Districts of Los Angeles County, 1998, *available at*: http://citeseerx.ist.psu.edu/viewdoc/summary?doi=10.1.1.576.7552, p. 10.

IC engines, specifically the General Electric Jenbacher Model J 620 GS-16 engines.[11] Thus, it is important to consider the potential of dioxin releases from the proposed power generation facility as the combustion of LFG in IC engines may produce dioxins.[12]

The formation of dioxin is largely of concern because the Scholl Canyon LFG contains chlorinated compounds.[13] Dioxins may form from the recombination of chlorinated compounds and hydrocarbons that are not fully oxidized in the combustion process.[14] This suggests that if hydrocarbons in the LFG are not fully oxidized (i.e. destroyed) by the proposed IC engines, the remaining hydrocarbons in the IC engine exhaust may recombine with chlorinated compounds and form dioxins.[15]

To explain further, the autoignition temperature of compressed natural gas is 540°C, meaning that compressed natural gas can burn as low as 540°C. [16] If the proposed IC engines burn the LFG at 540°C, there is potential that not all hydrocarbons in the LFG will be destroyed, as LFG must be burned at approximately 1000°C to achieve 98% destruction of organic compounds (e.g. hydrocarbons).[17] Further, if the hydrocarbons in the LFG are not fully destroyed, and the IC engine exhaust gasses containing hydrocarbons and chlorinated compounds are allowed to cool, there is potential that the remaining hydrocarbons and chlorinated compounds can recombine and form dioxins, via de novo synthesis. De novo synthesis of dioxins refers to the formation of dioxins from an unrelated organic structure.[18] Laboratory experiments have shown that de novo synthesis of dioxins can occur at temperatures ranging from approximately 200 to 450°C.[19] Thus, if the IC engines burn LFG at 540°C, and hydrocarbons are not fully destroyed, there is potential that the remaining

L110-B-6

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[11] "Biogas Renewable Generation Project Draft Environmental Impact Report." City of Glendale, July 2020, *available at:* http://glendalebiogasgeneration.com/#draft-eir, p. 4.61.

[12] "Dioxin and Furan Emissions from Landfill Gas-Fired Combustion Units." County Sanitation Districts of Los Angeles County, 1998, *available at*: http://citeseerx.ist.psu.edu/viewdoc/summary?doi=10.1.1.576.7552, p. 10.

[13] "Scholl Canyon Landfill: Quarterly Landfill Gas Composition January 2016 to August 2020." City of Glendale, Received: 19 August 2020 by Public Records Request.

[14] "Investigation of the Composition and Emissions of Trace Components in Landfill Gas." Parker, Dottridge, and Kelly, Environmental Agency, 2002, *available at:* https://www.gov.uk/government/organisations/environment-agency, p. 81.

[15] Ibid.

[16] "Natural Gas Engine Technologies: Challenges and Energy Sustainability Issue." Chala, Aziz and Hagos, Energies, October 2018, *available at:* https://www.researchgate.net/publication/328595009_Natural_Gas_Engine_Technologies_Challenges_and_Energy_Sustainability_Issue, p. 12.

[17] "Investigation of the Composition and Emissions of Trace Components in Landfill Gas." Parker, Dottridge, and Kelly, Environmental Agency, 2002, *available at:* https://www.gov.uk/government/organisations/environment-agency, p. 80.

[18] "De novo synthesis of dioxins: a review." Buekens and Zhang, International Journal of Environment and Pollution, January 2016, *available at:* https://www.researchgate.net/publication/313262739_De_novo_synthesis_of_dioxins_a_review, p. 65.

[19] "Development of Good Combustion Practice for Municipal Waste Combustors." Lanier and von Alten, U.S. Environmental Protection Agency, p. 6.

hydrocarbons and chlorinated solvents may recombine to form dioxins as the exhaust gasses cool. To be fully protective of the environment, the Project should consider if the proposed engines can generate dioxin emissions.

Moreover, the DEIR itself indicates that chlorinated compounds will be a constituent of exhaust emissions from the power generation facility (see excerpt below) (chlorinated compounds boxed in red).[20]

Table 1: Power Generation Facility TAC Emission Summary

L110-B-6

TAC	Chemical Abstracts Service # (CAS#)	Engines (lb./hr.)	Flares (pre-Project and Construction) (lb./hr.)
1,1,1 – Trichloroethane	71-55-6	3.87E-06	4.34E-05
1,1,2,2 – Tetrachloroethane	79-34-5	2.57E-04	2.89E-03
1,2 – Dibromoethane	106-93-4	1.06E-05	1.19E-04
1,1 – Dichloroethane	75-34-3	5.33E-06	5.98E-05
1,1 – Dichloroethene	75-35-4	2.54E-06	2.86E-05
1,2 – Dichloroethane	107-06-2	1.39E-05	1.56E-04
1,2 – Dichloropropane	78-87-5	2.81E-05	3.15E-04
2 – Propanol	67-63-0	8.26E-03	4.67E-02
Acetonitrile	75-05-8	1.06E-04	5.99E-04
Acrylonitrile	107-31-1	9.21E-04	5.21E-03
Ammonia	7664-41-7	2.70E-01	0.00E+00
Benzene	71-43-2	3.66E-04	2.07E-03
Benzyl chloride	100-44-7	2.27E-05	2.55E-04
Carbon disulfide	75-15-0	1.21E-04	6.85E-04
Carbon tetrachloride	56-23-5	4.46E-06	5.01E-05

[20] "Biogas Renewable Generation Project Draft Environmental Impact Report." City of Glendale, July 2020, *available at:* http://glendalebiogasgeneration.com/#draft-eir, p. 4.99-4.100.

L110-B-6

TAC	Chemical Abstracts Service # (CAS#)	Engines (lb./hr.)	Flares (pre-Project and Construction) (lb./hr.)
Carbonyl sulfide	463-58-1	8.07E-05	4.56E-04
Chlorobenzene	108-90-7	2.47E-05	2.77E-04
Chlorodifluoromethane	75-45-6	1.55E-04	1.74E-03
Chloroethane	75-00-3	1.11E-04	1.25E-03
Chloroform	67-66-3	3.30E-06	3.70E-05
Chloromethane	74-87-3	8.44E-05	9.47E-04
Dichlorobenzene	106-46-7	1.66E-04	1.87E-03
Dichlorodifluoromethane	75-71-8	2.62E-03	2.94E-02
Dichlorofluoromethane	75-43-4	3.72E-04	4.18E-03
Dichloromethane (methylene chloride)	74-87-3	1.40E-05	1.57E-04
Ethylbenzene	100-41-4	8.00E-04	4.52E-03
Ethylene dibromide	106-93-4	2.59E-07	2.91E-06
Formaldehyde	50-00-0	9.85E-03	3.51E-01
Fluorotrichloromethane	75-69-4	1.44E-04	1.62E-03
Hexane, n-	110-54-3	1.55E-03	8.78E-03
Hydrogen chloride	7647-01-0	1.78E+00	1.61E+00
Hydrogen sulfide	7783-06-4	3.15E-03	1.78E-02
Mercury (total)	7439-97-6	5.03E-05	4.54E-05
Methyl ethyl ketone	78-93-3	1.40E-03	7.93E-03
Methyl isobutyl ketone	108-10-1	5.14E-04	2.90E-03
Tetrachloroethylene	127-18-4	3.53E-05	3.96E-04
Toluene	108-88-3	1.37E-03	7.77E-03
Trichloroethylene	79-01-6	1.62E-05	1.81E-04
Vinyl chloride	75-01-4	8.03E-06	9.01E-05
Xylenes	1330-20-7	1.41E-03	7.95E-03

For reference, the maximum concentrations of chlorinated compounds detected in Scholl Canyon LFG during sampling events from January 2016 to August 2020 are also included in the table below. LFG samples were collected quarterly from the Scholl Canyon Landfill's North Header and South Header during the timeframe.[21] In comparison to the EPA's AP-42 default concentrations for LFG constituents, the sample data suggests that the chlorine compound concentrations in the Scholl Canyon LFG are generally low compared default LFG constituent concentrations.[22]

Table 2: Maximum Chlorine Compound Concentrations in Scholl Canyon LFG (Jan. 2016 to Aug. 2020)

[21] "Scholl Canyon Landfill: Quarterly Landfill Gas Composition January 2016 to August 2020." City of Glendale, Received: 19 August 2020 by Public Records Request.

[22] "Municipal Solid Waste Landfills." U.S. Environmental Protection Agency, AP-42, Vol. 1, Ch. 2.4, *available at:* https://www3.epa.gov/ttn/chief/ap42/ch02/final/c02s04.pdf

Chlorinated Compounds	Maximum Concentration
Methylene Chloride	**470 ppb**
1,1-Dichloroethene	**120 ppb**
Trichloroethylene	**150 ppb**
Tetrachloroethylene	**180 ppb**
Chlorobenzene	**250 ppb**
Vinyl Chloride	**130 ppb**
1,1-Dichloroethane	**75 ppb**
1,2-Dichloroethane	**220 ppb**
Dichlorobenzene	**1080 ppb**

L110-B-6

Considering that the proposed power generation facility would use four IC engines, and chlorinated compounds are expected to be present ***before and after*** the combustion process, further review of the LFG treatment is recommended to address potential dioxin emissions. In addition, the modeled chlorinated compound emissions from the IC engines are comparatively less than the chlorinated compound emissions from flares. This suggests that more chlorine compounds will be destroyed by the IC engines, which will subsequently increase the potential for dioxin formation. The proposed BACT for pre-combustion LFG treatment of sulfur and siloxane and post-combustion treatment of nitrous oxides and carbon monoxide[23] are not sufficient to adequately address and mitigate Project-related environmental impacts. Further, the DEIR fails to evaluate if Project VOC emissions meet the BACT determinations for landfill gas combustion equipment.[24] In order to mitigate such potential for dioxin formation, pre-combustion advanced LFG treatment options that remove VOCs should be considered, such as those described in Alternative 2 (see LFG treatment graphic in Figure 1). [25] A Packed-Bed/Packed/Tower Wet Scrubber is one such advanced treatment technology that effectively removes VOCs when used in combination with carbon adsorbers.[26] The EPA considers the potential for dioxin emissions from the combustion of landfill gas to be small, however, the

[23] "Biogas Renewable Generation Project Draft Environmental Impact Report." City of Glendale, July 2020, *available at:* http://glendalebiogasgeneration.com/#draft-eir.

[24] "Biogas Renewable Generation Project Draft Environmental Impact Report." City of Glendale, July 2020, *available at:* http://glendalebiogasgeneration.com/#draft-eir. p 4.52.

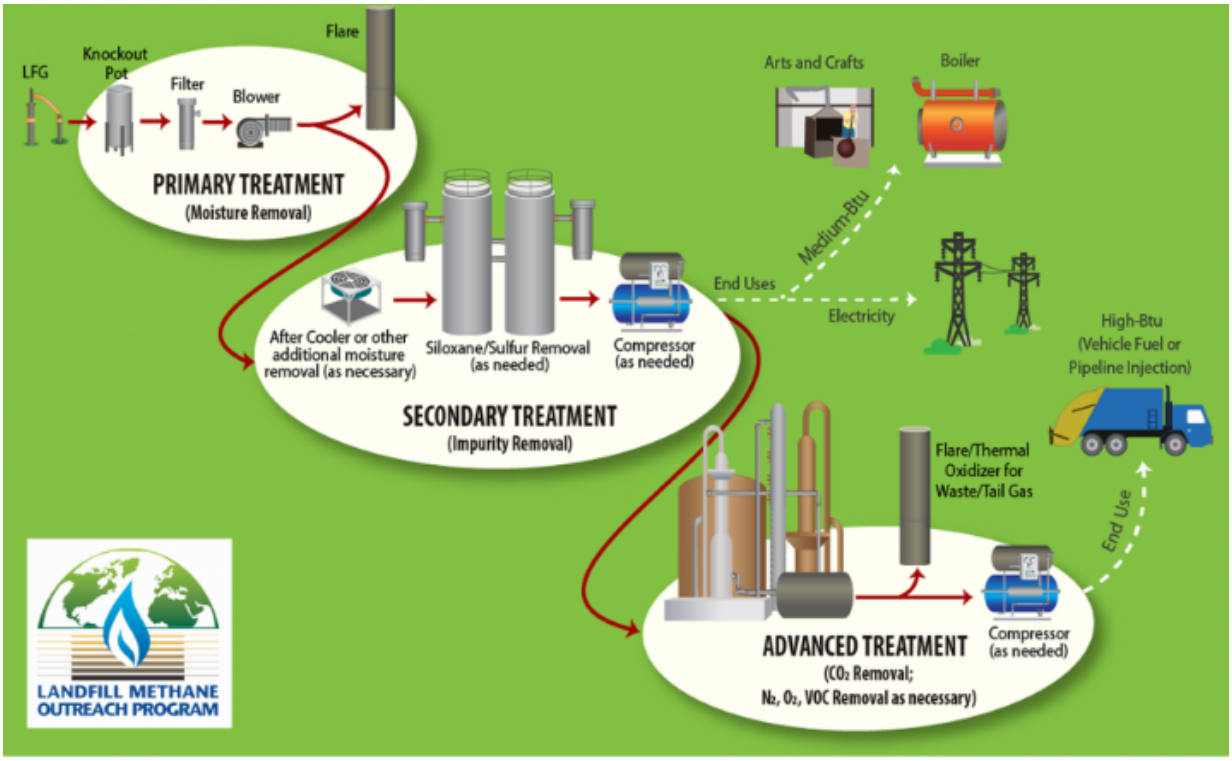
[25] "Landfill Methane Outreach Program." U.S. Environmental Protection Agency, website, available at: https://www.epa.gov/lmop/basic-information-about-landfill-gas.

[26] "Air Pollution Control Technology Fact Sheet." U.S. Environmental Protection Agency, EPA-452/F-03-015, *available at*: https://nepis.epa.gov/Exe/ZyPDF.cgi/P1008OGN.PDF?Dockey=P1008OGN.PDF.

L110-B-6

potential of dioxin emissions from the proposed Project should still be considered to be fully protective of the environment.[27]

Figure 1: LFG Treatment Graphic



L110-B-7

In addition, the DEIR fails to address how the proposed Project will adequately address the difference in methane composition between the Scholl Canyon LFG and common compressed natural gas. The DEIR states that a natural gas pipeline will be constructed to supply additional natural gas from the SoCalGas system to the power generation facility to increase the methane composition in the IC engine fuel. [28] However, the DEIR further states that "up to a maximum of ten percent (10%) of the total fuel consumed by the engines to be natural gas."[29] According to the Scholl Canyon LFG monitoring reports, the average methane composition of the LFG was approximately 34.9% for samples collected between January 2016 and August 2020.[30] This reveals a stark difference when compared to typical natural gas,

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[27] "Frequently Asked Questions About Landfill Gas and How It Affects Public Health, Safety, and the Environment." U.S. Environmental Protection Agency, June 2008, available at: https://cityofmidlandmi.gov/DocumentCenter/View/1858/Midland-Green-Project?bidId=, p. 4.

[28] "Biogas Renewable Generation Project Draft Environmental Impact Report." City of Glendale, July 2020, *available at:* http://glendalebiogasgeneration.com/#draft-eir. p. 2.7.

[29] Ibid.

[30] "Scholl Canyon Landfill: Quarterly Landfill Gas Composition January 2016 to August 2020." City of Glendale, Received: 19 August 2020 by Public Records Request.

which can contain methane compositions as low as 70%, with more common compositions of approximately 90%.[31] For demonstrative purposes, assume that the additional natural gas from the SoCalGas system is 100% methane. If 90% Scholl Canyon LFG (at 35% methane) is mixed with 10% SoCalGas natural gas (at 100% methane), the resulting methane composition would be 45%. This relatively low methane composition in comparison to natural gas may cause issues for maintaining a high-temperature burn in the proposed IC engines and could result in incomplete combustion. Further, the fluctuations in methane composition may also need to be addressed, as quarterly monitoring reports detected methane compositions as high as 43% in November 2017 and as low as 25.8% in February 2016.[32]

L110-B-7

The remaining gaseous constituents of Scholl Canyon LFG are chiefly nitrogen and carbon dioxide, with respective percentages of approximately 25.9% and 30.4% based on the January 2016 to August 2020 sample data.[33] The proposed pre-combustion treatment methods will reduce sulfur and siloxane concentrations in the LFG, however, further consideration of treatment methods should also be considered to reduce the non-combusted gaseous impurities in Scholl Canyon LFG, such as Guild Associates' Molecular Gate™ Pressure Swing Adsorption system.[34]

Further, the existing LFG collection system is inefficient due to the elevated composition of air in the collected LFG. According to the quarterly sampling reports, the South Header nitrogen measurements are approximately 50% higher than the North Header nitrogen measurements, at about 33.8% nitrogen and 21.8% nitrogen, respectively.[35] Given that the carbon dioxide and methane ratio is similar between the two headers, this suggests that the existing LFG collection system is experiencing an elevated air intake. It is recommended that the LFG collection system be improved to reduce oxygen infiltration.

L110-B-8

Considering the numerous issues involving the impurities in the LFG, it is recommended that the Project strongly consider Alternative 2. "Alternative 2 would include removing gas impurities through an LFG gas cleanup system at SCLF to meet stringent natural gas purity standards. After cleaning the LFG to meet SoCalGas standards, the natural gas would be compressed using new equipment at SCLF and delivered to SoCalGas through a new high-pressure pipeline."[36] Alternative 2 should be further considered for the

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[31] "Natural Gas Engine Technologies: Challenges and Energy Sustainability Issue." Chala, Aziz and Hagos, Energies, October 2018, *available at:* https://www.researchgate.net/publication/328595009_Natural_Gas_Engine_Technologies_Challenges_and_Energy_Sustainability_Issue, p. 11.

[32] "Scholl Canyon Landfill: Quarterly Landfill Gas Composition January 2016 to August 2020." City of Glendale, Received: 19 August 2020 by Public Records Request.

[33] Ibid.

[34] "Case Study: Nitrogen and Carbon Dioxide Removal from Landfill Gas." Guild Associates, Inc., *available at:* https://www.guildassociates.com/docs/documents/1088/N2%20CO2%20landfill%20case%20study.pdf

[35] "Scholl Canyon Landfill: Quarterly Landfill Gas Composition January 2016 to August 2020." City of Glendale, Received: 19 August 2020 by Public Records Request.

[36] "Biogas Renewable Generation Project Draft Environmental Impact Report." City of Glendale, July 2020, *available at:* http://glendalebiogasgeneration.com/#draft-eir. p. 1.6.

L110-B-8

following three reasons: 1) To avoid the potential for dioxin emissions from the proposed Project; 2) To mitigate TAC emissions other than dioxin from the proposed Project, including nitrogen oxides and carbon monoxide; and 3) To mitigate wildfire risks for the surrounding communities from the proposed Project.

Air Quality

Health Risk Impacts Associated with Dioxin Formation Inadequately Evaluated

L110-B-9

The DEIR concludes that the Project's health risk impact would be less than significant, based on a health risk assessment ("HRA") assessing the excess cancer risk resulting from the IC Engines and Flares (p. 4.101). However, the DEIR's evaluation of the Project's health risk impacts, as well as the subsequent less than significant impact conclusion, is incorrect, as the DEIR fails to evaluate the health risk impacts associated with the formation of dioxins during the combustion process.

As previously discussed, the combustion of LFG in IC engines can potentially generate dioxins, a known TAC, as well as other harmful TACs including nitrogen oxides and carbon monoxide. [37] As a result, the DEIR should have quantified and evaluated the Project's potential to generate dioxin, as well as other harmful TACs, pursuant to BAAQMD Regulation 2 Rule 5.[38] Here, however, the DEIR fails to mention or evaluate the Project's potential to generate dioxins whatsoever. As such, the Project should not be approved until an updated EIR is prepared, which makes a reasonable effort to connect the Project's TAC emissions, including emissions of dioxin, and the potential health risks posed to existing, offsite sensitive receptors. Furthermore, we emphasize that Alternative 2 would mitigate Project-related emissions of TACs and their associated health risk impacts on the surrounding communities.

Compliance of Existing Flares with SCAQMD Regulations

L110-B-10

The Project should also consider immediately replacing the existing flares with new flares to reduce emissions before the Project is operational. According to the DEIR:

> "The South Coast Air Quality Management District (SCAQMD) passed new regulations in January 2019 that requires landfills that do not convert 80% percent or more of LFG to beneficial use to replace the existing LFG flares with new flares that comply with more stringent NOX and VOC emissions."[39]

Thus, until the proposed Project is adequately evaluated, the existing flares should be replaced with new flares that comply with the more stringent nitrogen oxide and VOC emissions.

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[37] "Investigation of the Composition and Emissions of Trace Components in Landfill Gas." Parker, Dottridge, and Kelly, Environmental Agency, 2002, *available at:* https://www.gov.uk/government/organisations/environment-agency, p. 80.

[38] "NEW SOURCE REVIEW OF TOXIC AIR CONTAMINANTS." BAAQMD, January 2010, *available at:* https://www.baaqmd.gov/~/media/files/planning-and-research/rules-and-regs/reg-02/rg0205.pdf.

[39] "Biogas Renewable Generation Project Draft Environmental Impact Report." City of Glendale, July 2020, *available at:* http://glendalebiogasgeneration.com/#draft-eir. p. 1.6.

L110-B-11

SWAPE has received limited discovery regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,



Matt Hagemann, P.G., C.Hg.



Paul E. Rosenfeld, Ph.D.

L111

From: Kelly Graham-Scherer
To: Krause, Erik
Cc: Robert Scherer
Subject: Scholl Canyon Landfill
Date: Monday, September 28, 2020 5:33:02 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Erik Krause,

L111-1 We are homeowners living in Glemoaks Canyon and writing because we're concerned about the effects of Scholl Canyon Landfill upon the neighborhood and are very opposed to the industrialization of the landfill.

L111-2 A chief concern is fire. We just had one near there a few days ago and the landfill is a very high risk zone for fire and it does not seem like the plan takes it seriously enough.

L111-3 Air quality is another huge concern. Burning methane is not a clean solution and our family is very concerned that pollution from the project will exceed the South Coast Air Quality Management District (SCQAMD) thresholds for contaminants. It is our understanding that the city plans to use credits to make this project look green on paper, but that the effects on our lungs and the lungs of our children will not be negated by the use of priority reserve credits.

L111-4 Further, the earthquake we experienced on September 18th reminded all canyon residents that the potential project is to be located on a mountain that sits near a potential 6.7 earthquake fault. Seismic waves on a mountain can be amplified to 4 or 5 times the strength of field waves, and the report proposes insufficient mitigation measures for threats to power equipment, buildings, tanks, and pipelines and fails to present emergency back-up systems to mitigate damage from earthquakes or fire.

L111-5 Not only do we oppose the proposed changes to the landfill, we are upset, more broadly, with the existence of a landfill, so close to our neighborhoods, unlined in parts, and in a high fire zone.

A replacement for the landfill needs to be identified, and plans need to be made for its cleanup and closure, NOW, rather than at some vague point in the future.

L111-6 Promises to close the landfill and return it to recreational use have been made and broken many times in the past. It is my understanding that the landfill is supposed to be closed in 2028.

Where, and what, is the plan for that?

Sincerely,

Kelly, Robert, Graham and Gabriel Scherer
577 Arch Place
Glendale, 91206

L112

From: Liz Amsden
To: Krause, Erik
Subject: Proposed Biogas Renewable Generation Project - Comment on DEIR
Date: Monday, September 28, 2020 10:16:38 AM
Attachments: Scholl Canyon Landfill Biogas Comment from Liz Amsden - 27 September 2020.pdf

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Erik Krause, Director of Community Development
City of Glendale, Community Development Department
633 E. Broadway, Suite 103
Glendale, CA 91206-4311

Hi Erik

L112-1

I strongly recommend option 5.6.1 NO PROJECT.

See attached for all my comments.

Thank you for your work

Liz Amsden
Highland Park, CA

Public Comment on the Draft EIR from GWP
on the proposed BioGas Renewable Generation Project

Introduction

L112-2 The materials supplied by Glendale promoting the Biogas Renewable Generation Project are highly suspect given its workshop slides claim the project would be carbon free which is patently untrue.

100% Carbon free IS politically feasible if you factor in the downsides i.e. the costs of health and clean-up costs along with the environmental and fiscal costs of permitting, building and distributing carbon power.

L112-3 I am strongly opposed to ANY GWP proposals for the landfill, including this $35 million biogas electricity plant, and any other capital expenditures that will make expansion of the site to recoup their investment a priority and probably delaying its expected closure beyond the most recent 'date' of 2030. When it was established, the landfill was supposed to have been a TEMPORARY facility, slated to close over 40 years ago.

The Biogas Renewable Generation Project proponents claim it would beneficially use naturally occurring landfill gas from the Scholl Canyon Landfill as a renewable fuel to generate electricity.

L112-4 First of all, it is NOT naturally occurring: it is a direct result of Glendale creating and operating and NOT closing the dump as it was required to do decades ago. And it is NOT renewable in that it will require the continued operation of the dump with all its negative impacts on surrounding communities to provide a continuing source of methane. Yes, the existing content of the dump will continue to expel biogases for years but that is all the more reason for Glendale to clean up their garbage dump rather than to expand it.

L112-5 Furthermore, it adversely affects the health of tens of thousands of people, especially children and the elderly, in neighborhoods of Glendale, Eagle Rock, Pasadena, Highland Park, La Cañada, Montrose, Glassell Park and more.

All the greenwashing in the world does not change the fact that anything but the removal and clean-up of the dump is detrimental to the people of Glendale and the surrounding communities.

And that Glendale has been flaring the methane at Scholl Canyon since April 2018 WITHOUT appropriate warning to or input from those who have been affected.

L112-6 From an environmental point of view, flaring is the worst way to deal with methane gas, polluting the air we breathe, coating our homes and parks with particulate matter which is known to contain toxins and contributing to global warming.

Residents within a two-mile radius have been complaining of difficulty breathing as well as soot and particulate material on homes, in pools and on cars. These effects and more will only grow over time and expand as the wind spreads the pollutants further afield.

L112-7 Burning natural gas in future years is also in direct opposition to a state mandate requiring 100 percent power from non-carbon-based sources by 2045.

L112-8 Finally, any work by or with the SCGC, which has a well-documented history of cutting corners and disregarding safety, is suspect – neither Glendale, nor Pasadena, nor Eagle Rock deserve to become the next Porter Ranch.

L112-9 Recommendations

Five years ago many organizations in Glendale and northeast Los Angeles opposed the unnecessary expansion plans for the Scholl Canyon Landfill, located just behind the hills above the 134 Freeway and accessed via Figueroa Street near the Eagle Rock Recreation Center. While the Scholl dump is on the outskirts of Glendale, it overlooks northeast Los Angeles and any changes there affect their neighborhoods' health, safety, and economy.

Now this plan for a "Biogas Renewable Generation Project" - an on-site processing plant for the natural gas produced by the existing garbage in the dump – which is listed as in the 90041 zip code has yet to seriously take the interests of Eagle Rock stakeholders into consideration. A green-washed EIR is not acceptable.

L112-10 I live in Highland Park and my understanding is that vehicle and equipment access for this project will not only be off the 134 but like the garbage haulers heading to the Scholl Canyon dump, be up Figueroa which is a direct impact on me and my community.

L112-11 Furthermore, it is my continuing opinion that the dump disproportionately affects the citizens of northeast Los Angeles who derive no benefit from it and who suffer from particulate and other airborne pollutants associated with the dump.

L112-12 I strongly recommending the project be terminated before wasting further taxpayer dollars, that the Scholl Canyon Landfill be permanently closed, and that the City of Glendale immediately remediate the dump area and all ancillary environmental effects including the impact on the entire water table affected by the leaking contaminant shields.

L112-13 This BEFORE an earthquake or fire create a true disaster in the area. A situation that will only be magnified with the installation of the facility and its infrastructure. Remember the Paradise Fire.

L112-14 History

The dump was opened in 1961 and the original agreement with LA County stated that the right to use the property was for 17 years or until it has served its purpose, *whichever first occurs*.

Which meant the dump should have closed in the late 1970s but Glendale kept extending its use. And the income the city derives from it. Glendale needs to shut the dump down as was required to have been done decades ago and clean up the environmental mess.

The fact that it is long past its termination date means that the Scholl Canyon Landfill does not meet the 1998 Environmental Protection Agency requirement for an "impermeable barrier" separating the toxic compounds that build up in and travel through massive trash piles, even in landfills designated for household waste, from the water table.

L112-14 The dump is built upon fractured rock which allows seepage, albeit slowly. This means that, contrary to Section 1 of the draft EIR, this is NOT a non-hazardous landfill. In fact, five years ago a geologist from UCLA submitted a report documenting that compounds known to cause cancer exist in test wells west of the dump.

Furthermore, back in 1983, Glendale installed a gas collection and recovery system made up of 28 wells and more than 10,500 feet of pipeline in Scholl Canyon at a cost of $350,000. The methane was channeled to a $3-million power plant at the base of the landfill that converted it into electricity capable of serving 2,500 homes, about 1% of Glendale's customers. The power plant was shut down in 1987 because of toxic and smog-inducing emissions from the internal combustion engines at the plant exceed standards adopted in 1985 by the South Coast Air Quality Management District.

The AQMD came after Glendale again for flaring the methane gas on the site which released toxic sulfur fumes into the air far too close to the residential community of Eagle Rock.

L112-15 Methane gas from the dump may be captured – a good thing considering its impact on climate change – but it is NOT and should not be referred to as a renewable energy source. To generate power, whether as LFG or LNG or NatGas, the methane still needs to be burned, polluting our air and further affecting the neighborhood.

For GWP to make money running a biogas plant, it would have to expand the dump to accept more garbage.

L112-16 The methane is not going away. Even if the landfill shut down today, the garbage already there would produce methane for decades to come. So, the methane from Scholl Canyon has to be managed. Glendale owes it to the residents of the affected areas including parts of Glendale to fix this, not make it worse. And not by cynically making a profit center out of our suffering.

Baseline conditions should FOREVER be based on the dump never having been there. Only then will an EIR address the true impact.

The Grayson Repowering Project as well as this Bio Gas Renewable Generation Project are abominations at a time when climate change is a significant problem and the world needs to reduce its energy footprint.

L112-17 Glendale City Council in 2011 unanimously approved a zero-waste policy that commits the city to reducing trash and dumping by 75% by 2020 and 90% by 2030. The BioGas Project appears to count on continuing use which contradicts and undermines this policy.

L112-18

SAYING that the various possible significant effects of a project were determined not to be significant as it does in Section 1.2.7 and many other places throughout the DEIR does not make it so. Perhaps to people living in Glendale but there is massive evidence of serious impact on people residing in Northeast LA, especially to seniors and small children.

This may be the time to point out that the excessive verbiage in this document serves one purpose and one purpose only. To cover up its half-truths and felonious assumptions by trying to put a flowery coat on an untenable position.

The dump NEEDS to be closed, and the city of Glendale REQUIRED to fund a full environmental cleanup and mitigation of effects of such clean up on the surrounding communities.

L112-19

<u>Additional comments on the DEIR by point</u>

4.1 Aesthetics. You will never convince people watching garbage trucks roll by on a daily basis, that they are contributing to anything pleasing. A dump is a dump. You can paint lipstick on it but it doesn't make it any more appealing.

This also gets into the demolition and construction which will further degrade quality of life for people living in Northeast LA. On top of the constant trash hauling – NONE of their own making as Glendale prohibits LA residents from using the dump – those living in Highland Park and Eagle Rock will now have construction vehicles and diesel fumes, construction noise and dust, and high-powered lights during night-work. NOT ACCEPTABLE.

L112-20

4.2 Air pollution. The report admits that it is an area prone to temperature inversions trapping air-borne pollutants close to the ground. Los Angeles is moving rapidly towards reducing its carbon footprint and pointing a finger elsewhere does NOT reduce Glendale's responsibility to cut the dumps polluting effects especially on the community of Eagle Rock.

Nevertheless, Glendale MUST follow CEQA guidelines and address the CUMULATIVE effect of its polluting i.e. in ADDITION to the existing problems – including the 8 Freeways that transect the adjacent area and the impact of the industrial pollution in including elevated levels of lead due to improper battery recycling pollution in neighborhoods to the south and east of Eagle Rock.

In coming years the health impacts to lower-income communities of color due to functional red-lining will and should be litigated. Anything adding to the existing hazards need to be put on hold. Now.

Also, although I live over the ridge in Highland Park, I noticed a black bathtub ring in my swimming pool a year or so ago which someone at the Councilmember's office ascribed to the ongoing flaring at the dump that was occurring at the time.

L112-21 4.4.4 Energy use for construction. I can't believe these people actually promote the use of diesel generators as well as diesel and gasoline on and off-road vehicles as being beneficial.

4.5 Geology, hydrology and earthquakes. We already have seepage as documented by two experts in 2015, one from CalTech, the other from UCLA. The area had a good jolt a week or so ago from a 4.5 magnitude quake with an epicenter 10 miles removed.

L112-22 The Verdugo fault lies less than half a mile from the dump and your own table shows s that it is capable of earthquakes up to 6.9 on the Richter scale. There are 12 more faults within a 15 mile radius with one capable of reaching 7.8.

Any fracturing of gas production and collection hardware including pipelines and storage containers at the dump would release toxic gas and, very likely, lead to explosions and fires right in the city.

4.6 Emissions of greenhouse gases. This document states quite clearly that the project WILL emit

L112-23 greenhouse gases. Projected amounts are irrelevant. ANY additional emissions, especially in adjacent to residential areas, are NOT acceptable. And to state NO MITIGATION MEASURES ARE REQUIRED???

The AQMD has been taken over in recent years by people perhaps more amenable to pollution but the RESIDENTS of this area are not so forgiving.

4.7 Hazardous materials. Complying with guidelines is never enough. Guidelines change, people get ill, people sue.

L112-24 It is never one issue, it's a compounding of them. The lead in the pipes of Flint, MI were not a problem until the state decided to use a cheaper water source and discontinue corrosion treatments; thalidomide was a safe drug, until given to pregnant women; building apartment buildings on the cheaper land near abandoned oil wells in South Central made economic sense, until fracking came along.

4.8 Water quality issues - Construction activities could result in the degradation of water quality, releasing sediment, oil and greases, and other chemicals into the existing storm drain system. Construction materials such as fuels, solvents, and paints may present a risk to surface water quality. Refueling and parking of construction vehicles and other equipment on-site during construction may

L112-25 result in oil, grease, or related pollutant leaks and spills that may discharge into the storm drain system.

Saying all parties will comply with NATIONAL standards in the time of Trump is equivalent of telling residents – your own your own, tough luck. And that's if everyone plays by the book.

Oh, and 'Potential runoff from the Project site would be limited to oils, grease, fuel, antifreeze, and byproducts of combustion (such as cadmium, nickel, and other metals) generated by onsite personnel vehicles. Runoff will be collected in a catch basin on the north side of the facility and into a 10-inch underground pipe that will drain into the adjacent landfill drainage system.'

L112-25 And from there into the water table? Given there is no barrier below?

L112-26 By law most of the above chemicals have to be taken to hazardous waste facilities to be disposed of safely.

L112-27 What happens if there's a fire, spills, explosions – all common occurrences on construction sites – what's the playbook then?

No mitigation measures???

L112-28 4.10 Noise. No sure where you culled your presumed ambient noise levels from - above 50 decibels is considered unacceptable in residential areas. It can contribute to coronary and cardiovascular disease especially among children and the elderly, of which there are quite a number in the adjacent communities. Noise is known to negatively impact children's learning and behavior. You are not talking a few days; you are talking 15 to 18 MONTHS. Ongoing noise is stressful, disruptive and can aggravate both medical and psychological conditions.

Furthermore, it is disruptive to wildlife. Deer abound in the area as well as opossum, raccoons, skunks, lizards, birds and insects, all of which perform useful functions in the ecosystem.

L112-29 4.14 Wildfire. At issue is not whether the facility would contribute to an increased danger of wildfires. The issue is what would be released into the air and water if a wildfire swept through the dump. The gas itself is flammable, the possibility for explosions high.

Given the toxicity of materials at the dump itself and inherent in biogas production, storage and shipping, any wildfire would have extreme impact on people in the area and would limit firefighters ability to fight the flames. The firefighters are responsible for their own health and life and dump fires are one of their worst fears because they just don't know what chemicals they are facing. It also restricts what mediums can be used to tame the flames.

L112-30 <u>Conclusion</u>

As with the above-referenced dump expansion, there are serious concerns about air quality - especially toxic particulate matter, groundwater contamination, noise, and aesthetics (since the proposed location above Eagle Rock already has visible lights and trailers) both during and after the construction period. The location will probably have to be significantly expanded to accommodate the water tanks and the lights and noise will be an ongoing concern for Eagle Rock since it appears that the BioGas Renewable Generation plant will operate 24-7.

The sole access point is at the northern end of Figueroa, adjacent to homes, schools, a major City park, and a historic cultural monument - all in the City of Los Angeles so City stakeholders bear a significant burden from the current operation of the landfill, including trash and debris, noise, pollution, traffic, and deteriorating road conditions in the areas around the entrance to the landfill.

The construction itself which will take well over a year will further exacerbate the use of the Figueroa corridor since the Glendale City Council refused to allow dump trucks to use the Glenoaks Blvd access many decades ago.

Meanwhile the dump continues to percolate known carcinogens and other toxic chemicals through the fractured bedrock below it into the groundwater west of the landfill adjacent to City water supplies.

Pollution doesn't just stop at the border of Glendale or even Eagle Rock.

L112-30 The Verdugo and Scholl Canyon faults run through the site but any earthquake damage from them or the more dangerous faults close-by will certainly affect Los Angeles including releasing more dangerous contaminants from the dump. If pipes rupture, the gas and explosions won't magically stop at a city line; if there is a leak, how will Glendale evacuate and compensate the Los Angeles communities affected.

The so-called Biogas Renewable Generation Project is unsustainable under any circumstances, and is irreconcilable with any vision of a greener California. Glendale needs to shut the dump down and stop using Glendale residents' tax dollars on this and other projects which will drive dump expansion.

That money is needed for clean-up and remediation, starting now. And the inevitable lawsuits.

Again, I strongly recommend option 5.6.1 NO PROJECT. And I highly recommend Glendale take immediate action to close and remediate the dump.

L112-31 The solution to all the garbage is for communities across the southland to actively take steps to reduce consumer and light industry waste by penalizing companies for over-packaging and over-marketing of single use products and disposable good.

And the REAL solution is to start moving everyone to a lower energy demand.

Liz Amsden
Los Angeles

L113

From: Mary Fischer
To: Krause, Erik
Subject: CityWatch article on problems with DEIR
Date: Monday, September 28, 2020 10:23:01 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Mr Krause: This is how many of us in Eagle Rock think about the proposal.

L113-1

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fcitywatchla.com%2Findex.php%2Fcw%2Flos-angeles%2F20488-in-the-plus-column-of-huizar-s-legacy&data=02%7C01%7Ckrause%40glendaleca.gov%7C7fc3a1a535a74d694a9c08d86437a863%7Ce5115311ffc3421bbc03a5d8c79bf546%7C0%7C0%7C637369537800766440&sdata=BVesu9DFbXGLOUylrxF6GFONgvwi3oB1c4f46mJEImY%3D&reserved=0

Sent from my iPhone

In the Plus Column of Huizar's Legacy

LIZ AMSDEN / 28 SEPTEMBER 2020



GUEST COMMENTARY-There has been a lot of ink about José Huizar's precipitous fall from being the all-powerful chair of the Los Angeles City Council Planning and Land Use Management Committee (PLUM) to being indicted on Federal racketeering charges.

Not so much has been written recently about the good that he did for the communities he represented, from historic preservation to Safe Streets, from his compassion and advocacy on behalf of the homeless to his environmental leadership.

Five years ago, Huizar was a leader in the fight to oppose the unnecessary expansion plans for the Scholl Canyon Landfill, located just behind the hills above the 134 Freeway and accessed via Figueroa Street near the Eagle Rock Recreation Center. While the Scholl dump is on the outskirts of

Glendale, it overlooks northeast Los Angeles (NELA) and any changes there affect their neighborhoods' health, safety, and economy.

Two years ago, Glendale hatched another plan – for a "Biogas Renewable Generation Project" – an on-site processing plant for the natural gas produced by the existing garbage in the dump. Although it is listed in Eagle Rock's 90041 zip code, Glendale still clearly refuses to seriously take the interests of Eagle Rock stakeholders into consideration.

After being rejected in 2018 with strong opposition from NELA, Glendale Power and Water (GWP) submitted a Draft EIR (Environmental Impact Report) but its comparisons are questionable. Baseline conditions should FOREVER be based on the dump never having been there. Only then will an EIR address the true impact.

This draft EIR is as pretty a piece of greenwashing I have ever seen and deserves to be consigned to the dump it purports to promote.

To quote Business News Daily, "greenwashing is when a company or organization spends more time and money on marketing themselves as environmentally friendly than on minimizing their environmental impact. It is a deceitful advertising gimmick intended to mislead consumers. . ."

If you want to add your voice against it, comments are due this Wednesday. Further information can be found here and at the end of this article.

The Los Angeles City Attorney is against Glendale's actions and the Chief Legislative Analyst has filed a letter on behalf of CD 14's constituents. But too often money speaks louder than words. Unless and until there is a groundswell of opposition like what Huizar led when Glendale tried to expand the dump six or seven years ago, we in the northeast are at risk.

History

The dump, aka the Scholl Canyon Landfill, was opened in 1961 and the original agreement with LA County stated that the right to use the property was for 17 years or until it has served its purpose, *whichever first occurs*.

Which meant the dump should have closed in the late 1970s, but Glendale kept extending its use. And the income the city derives from it. Glendale needs to shut the dump down as was required to have been done decades ago and clean up the environmental mess.

The fact that it is long past its termination date means that the Scholl Canyon Landfill does not meet the 1998 Environmental Protection Agency requirement for an "impermeable barrier" separating the toxic compounds that build up in and travel through massive trash piles, even in landfills designated

for household waste, from the water table.

The dump is built upon fractured rock which allows seepage, albeit slowly. Despite claims in the Draft EIR to the contrary, this is NOT a non-hazardous landfill. In fact, five years ago a geologist from UCLA submitted a report documenting that compounds known to cause cancer exist in test wells west of the dump.

Impact of the proposed project on Northeast Los Angeles

The Biogas Renewable Generation Project proponents claim it would beneficially use naturally occurring landfill gas from the Scholl Canyon Landfill as a renewable fuel to generate electricity.

First of all, it is NOT naturally occurring: it is a direct result of Glendale creating and operating and NOT closing the dump as it was required to do decades ago. And it is NOT renewable in that it will require the continued operation of the dump with all its negative impacts on surrounding communities to provide a continuing source of methane. Yes, the existing content of the dump will continue to expel biogases for years but that is all the more reason for Glendale to clean up their garbage dump rather than to expand it.

Furthermore, it adversely affects the health of tens of thousands of people, especially children and the elderly, in neighborhoods of Glendale, Eagle Rock, Pasadena, Highland Park, La Cañada, Montrose, Glassell Park and more.

All the greenwashing in the world does not change the fact that anything but the removal and clean-up of the dump is detrimental to the people of Glendale and the surrounding communities.

And that Glendale has been flaring the methane at Scholl Canyon since April 2018, polluting the air we breathe, coating our homes and parks with particulate matter which is known to contain toxins and contributing to global warming.

Residents within a two-mile radius have complained of difficulty breathing as well as soot and particulate material on homes, in pools and on cars. My pool had a greasy black bathtub ring as if it had been used by a carbon Cat-in-the-Hat and cloned itself in my shower when I tried to wash it off. These effects and more will only grow over time and expand as the wind spreads the pollutants further afield.

Burning natural gas in future years is also in direct opposition to a state mandate requiring 100 percent power from non-carbon-based sources by 2045.

And how far can we trust people regarding safety when they are trying to make a dollar? Neither Glendale, nor Pasadena, nor Eagle Rock deserve to become the next Porter Ranch.

Considering its impact on climate change, capturing methane gas from the dump may be better than flaring it – but it IS not and should NOT be referred to as a renewable energy source. To generate power, whether as LFG or LNG or NatGas, the methane still needs to be burned, polluting our air, and further affecting the neighborhood.

This also gets into the demolition and construction which will further degrade quality of life for people living in Northeast LA. On top of the constant trash hauling – NONE of their own making as Glendale prohibits LA residents from using the dump – those living in Highland Park and Eagle Rock will now have construction vehicles and diesel fumes, construction noise and dust, and high-powered lights during night-work. NOT ACCEPTABLE.

Glendale MUST follow CEQA guidelines and address the CUMULATIVE effect of its polluting i.e. in ADDITION to the existing problems – including the eight freeways that transect the adjacent area and the impact of the industrial pollution in including elevated levels of lead due to improper battery recycling pollution in neighborhoods to the south and east of Eagle Rock.

In coming years, the health impacts to lower-income communities of color due to functional red-lining will and should be litigated. Anything adding to the existing hazards need to be put on hold. Now.

Then there is the risk of earthquakes: the area had a good jolt a week or so ago from a 4.5 magnitude quake with an epicenter 10 miles removed.

The Verdugo fault lies less than half a mile from the dump is capable of earthquakes up to 6.9 on the Richter scale. There are 12 more faults within a 15-mile radius, with one capable of reaching magnitude 7.8.

Any fracturing of gas production and collection hardware including pipelines and storage containers at the dump would release toxic gas and, very likely, lead to explosions and fires right in the city.

It is never one issue, it's a compounding of them. The lead in the pipes of Flint, MI were not a problem until the state decided to use a cheaper water source and discontinue corrosion treatments; thalidomide was a safe drug, until given to pregnant women; building apartment buildings on the cheaper land near abandoned oil wells in South Central made economic sense, until fracking came along.

Noise, which the DEIR acknowledges will be a factor, is known to negatively impact children's learning and behavior. You are not talking a few days; you are talking 15 to 18 MONTHS. Ongoing noise is stressful, disruptive and can aggravate both medical and psychological conditions.

Furthermore, it is disruptive to wildlife. Deer abound in the area as well as opossum, raccoons, skunks, lizards, birds, and insects, all of which perform useful functions in the ecosystem.

Operating a gas plant in an area of known fire risk is tempting the climate gods. At issue is not whether the facility would contribute to an increased danger of wildfires; the gas itself is flammable, the possibility for explosions high; and the real question is what toxins would be released into the air and groundwater if a wildfire swept through the dump.

Given the toxicity of materials at the dump itself and inherent in biogas production, storage and shipping, any wildfire would have extreme impact on people in the area and would limit firefighters' ability to fight the flames. One of firefighters' worst fears are dump fires because they just don't know what chemicals they are facing. It also restricts what mediums can be used to tame the flames.

Conclusion

As with the above-referenced dump expansion, there are serious concerns about air quality -- especially toxic particulate matter, groundwater contamination, noise, and aesthetics (since the proposed location above Eagle Rock already has visible lights and trailers) both during and after the construction period. The location will probably have to be significantly expanded to accommodate the water tanks and the lights and noise will be an ongoing concern for Eagle Rock since it appears that the BioGas Renewable Generation plant will operate 24-7.

The sole access point is at the northern end of Figueroa, adjacent to homes, schools, a major City park, and a historic cultural monument -- all in the City of Los Angeles so City stakeholders bear a significant burden from the current operation of the landfill, including trash and debris, noise, pollution, traffic, and deteriorating road conditions in the areas around the entrance to the landfill.

The construction itself which is estimated to take 15 to 18 months (and WHEN did a project of this complexity ever finish on schedule?) will further exacerbate the use of the Figueroa corridor since the Glendale City Council refused to allow dump trucks to use the Glenoaks Blvd access many decades ago.

Meanwhile the dump continues to percolate known carcinogens and other toxic chemicals through the fractured bedrock below it into the groundwater west of the landfill adjacent to City water supplies.

Pollution doesn't just stop at the border of Glendale or even Eagle Rock.

The Verdugo and Scholl Canyon faults run through the site but any earthquake damage from them or the more dangerous faults close-by will certainly affect Los Angeles including releasing more dangerous contaminants from the dump. If pipes rupture, the gas and explosions won't magically stop at a city line. If there is a leak, how will Glendale evacuate and compensate the Los Angeles communities affected?

Their argument that it is the best solution is spurious. The best, the only, solution is to close the dump. And yes, that will cost money. Lots of it. But Glendale has made money off the dump for decades, especially if you factor in the cost of disposing of their own garbage elsewhere.

The dump NEEDS to be closed, and the city of Glendale should be REQUIRED to fund a full environmental cleanup and mitigation of effects of such clean up on the surrounding communities.

Comments close on the DEIR on September 30, 2020; send yours, be it 10 pages or 10 lines, to: *Erik Krause, Director of Community Development, City of Glendale, Community Development Department, 633 E. Broadway, Suite 103, Glendale, CA 91206-4311; fax (818) 240-0392* or email him at ekrause@glendaleca.gov.

(Liz Amsden is an activist from Northeast Los Angeles with opinions on much of what goes on in our lives. She also writes on behalf of the Budget Advocates' mission regarding the City's budget and services. In her real life she works on budgets, for film and television, where fiction can rarely be as strange as the truth of living in today's world.) Photo: Roger Wilson / LAT Staff Photographer) Prepped for CityWatch by Linda Abrams.

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L114

From: Rona Compton
To: Krause, Erik
Subject: BIO GAS Generation Renewable EIR
Date: Monday, September 28, 2020 11:37:37 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Krause,

L114-1 I'm writing in opposition to the Bio GAS plant proposal for Scholl Canyon dump. As a resident of Eagle Rock who lives just below the hillside I ask why you want to put the health of my community in the City of Los Angeles (Eagle Rock) at further risk for pollution in our air and ground and increase the risk of fire in an already fire prone area.

I object strongly to the project.

Rona Compton
5133 MOUNT ROYAL Drive
Los Angeles 90041

323 333-6395

L115

9/20/2020

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

IT WOULD BE TOO CLOSE TO A DENSELY POPULATED AREA. AS RESIDENTS, WE ARE ONLY 1/2 MILE AWAY.

L115-1 THERE ARE SEVERAL RISKS AS A RESULT; RISKS THAT I DON'T THING THE CITY WANTS TO BE FULLY LIABLE FOR INTO THE FUTURE. METHANE FIRE AND HEALTH RISKS, PROXIMITY TO THE VERDUGO

L115-2 HILLS FAULT LINE, NOISE POLLUTION, AND VISUAL BLEMISH ON THE RIDGELINE. THERE ARE OTHER

L115-3 SOLUTIONS THAT DON'T IMPOSE THESE RISKS.

Thank you.

Sincerely,

TOBIN WILLS
2613 E. GLENOAKS BLVD.
(GLENOAKS CYN. RESIDENT FOR 21 YRS.)

Place
Stamp
here

Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

==========fold==========

==========fold==========

L116

From: Adrineh "Audry" Zarokian
To: Krause, Erik
Subject: Comment on BioGas Renewable Gen. Project DEIR
Date: Tuesday, September 29, 2020 12:12:12 AM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Erik Krause,

L116-1 I hope my email finds you well. It's unfortunate that I find myself reviewing and commenting on yet another DEIR for a proposed project at Scholl Landfill, Glendale's Dump. The landfill is surrounded on all sides by beautiful residential communities, schools, recreational facilities, etc. It's time the City of Glendale stops focusing on profits and green energy credits, and makes the health and safety of its residents top priority. I oppose the Biogas Renewable Gen. Project for the following reasons:

L116-2 **Wildfire:** Wildfire is a huge risk to Glenoaks and Chevy Chase Canyons, as well as to the nearby Linda Vista and Eagle Rock neighborhoods, most of which have narrow, single-access roads. Adding an above-ground 3,500 feet long natural gas pipeline and generating electricity will increase the fire risk in an already very high fire hazard zone. Because of its location in a Very High Fire Hazard Zone and with Earthquake fault lines going through it, the landfill should not be further industrialized for profit, but plans should be put in motion to shut down the landfill by 2028 and process the methane in the most environmentally conscious manner.

The wildfire plan in the DEIR minimizes the danger and carelessly assumes that an on-site water tank and a fire department more than five miles away are sufficient. In my last 9 years as a resident in Glenoaks Canyon, we have twice been evacuated from our home due to fire. In fact, there was a fire AT the landfill earlier this month, September 2020.

L116-3 **Air Quality:** According to the DEIR, 4.2.1.5 Existing Air Quality

"The closest monitoring station to the proposed Project site is located in Pasadena, approximately four miles southeast in Los Angeles County. Data for pollutants that are not monitored at this station, such as SO2, PM10, and lead, are taken from the Los Angeles-North Main Street monitoring station. The second site was chosen based on proximity and general wind direction in relation to the Scholl Canyon Landfill. The Los Angeles-North Main Street monitoring station is located approximately six miles south of the proposed Project site."

The greatest adverse health impact from environmental toxins and pollutants is experienced by individuals within a 2 mile radius of the landfill. Therefore, what is the logic in placing the Air Quality monitoring devices 4 miles and 6 miles out from the landfill, instead of within a 2 mile radius? It appears that perhaps the reason in placing the sensors so far out might not have much to do with wind direction (as the wind must first pass through the first 2 miles in order to reach the next 4 miles), but perhaps it's a way to skew the data, because less toxins and pollutants will reach the 4 and 6 mile radius boundary, than a radius within 2 miles from the source. What say

you?

By now, steps should have been taken to place Air Quality monitoring devices/sensors within a 2 mile radius of the landfill and proposed site of the Biogas Renewable Gen. Project. Over the course of the last 6 years, members of Coalition for Landfill Alternatives (CSLA) have repeatedly brought this concern to the attention of City Staff, specifically to Steve Zurn, and asked for Air Quality Monitoring Sensors/Devices be placed within Glenoaks Canyon and Surrounding areas, within a 2 mile radius of the landfill.

L116-3

1). Are there now Air Quality Monitoring Sensors/Devices within a 2 mile radius of Scholl Canyon Landfill?

2). If so, why were the results of sensors within a 2 mile radius not used to evaluate the Air Quality in this DEIR?

3). If not, what is the reason for not placing Air Quality Monitoring Sensors/Devices within a 2 mile radius of the landfill and proposed site of the Biogas Renewal Gen. Project?

L116-4 I am also concerned about the unhealthy and dangerous emissions the plant will produce to pollute the air we breathe. There are cleaner solutions to burning the methane and we ask you to consider them.

L116-5 Pollution from the project will exceed the South Coast Air Quality Management District (SCQAMD) thresholds for four contaminants, but the DEIR does not discuss either mitigation or using the best available control technology (BACT).

L116-6 This is NOT a green project. The priority reserve credits that GWP hopes to receive make it green on paper, but it is NOT green for our lungs, our bodies, our children, or our neighborhoods. Priority reserve credits do not automatically erase the actual number of pollutants and toxins released by this proposed project.

L116-7 The DEIR also ignores carcinogenic pollutants such as dioxins and furans.

L116-8 **Geology and Soils**: The project will be located atop a mountain that sits near a potential 6.7 earthquake fault. Seismic waves on a mountain can be amplified to 4 or 5 times the strength of field waves, and the report both proposes insufficient mitigation measures for threats to power equipment, buildings, tanks, and pipelines and fails to present emergency back-up systems to mitigate damage from earthquakes or fire.

We all got a wake-up call just before midnight on Friday, September 18. The earthquake was a relatively mild one, but it still shook vigorously and for a long time. How would the proposed power plant stand up to a quake directly beneath it? The DEIR doesn't even address that possibility.

L116-9 The DEIR does not address closure plans for the landfill. Promises to close the landfill and return it to recreational use have been made and broken many times in the past. I urge the City of Glendale and the LA Sanitation District to put into effect closure plans for the landfill and close it by 2028.

Thank you,

Audry Zarokian
2280 Hollister Terrace
Glendale, CA 91206
Co-Founder, Coalition for Scholl Landfill Alternatives (CSLA)
Board Member, Glenoaks Canyon HOA

L117

From:	Kwan-Davis, Ruby@Wildlife
To:	Krause, Erik
Cc:	Wilson-Olgin, Erinn@Wildlife; Tang, Victoria@Wildlife; Valand, Andrew@Wildlife; Silva, Felicia@Wildlife; Rieman, Frederic@Wildlife; Howell, Susan@Wildlife; state.clearinghouse@opr.ca.gov
Subject:	CDFW Comments on Biogas Renewable Generation Project DEIR
Date:	Tuesday, September 29, 2020 3:07:28 PM
Attachments:	CDFW Comments on Biogas Renewable Generation Project DEIR.pdf

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Krause,

L117-1 The California Department of Fish and Wildlife has completed review of a Draft Environmental Impact Report (DEIR) submitted by the City of Glendale for the Biogas Renewable Generation Project (SCH # 2017081062). Please find CDFW's comment letter attached. Thank you for the opportunity to provide comments. If you have any questions or concerns regarding CDFW's comments, please feel free to contact CDFW at your convenience.

Sincerely,
Ruby

Ruby Kwan-Davis
Senior Environmental Scientist (Specialist)
Temporary Number: (657) 215-1007
Email: Ruby.Kwan-Davis@wildlife.ca.gov

California Department of Fish and Wildlife
South Coast Region 5
4665 Lampson Avenue
Los Alamitos, CA 90720

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM*, *Governor
CHARLTON H. BONHAM, Director

September 29, 2020

Mr. Erik Krause
City of Glendale
633 East Broadway, Room 103
Glendale, CA 91206
ekrause@glendaleca.gov

Subject: Biogas Renewable Generation Project, Draft Environmental Impact Report, SCH #2017081062, City of Glendale, Los Angeles County

Dear Mr. Krause:

L117-2

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Draft Environmental Impact Report (DEIR) for the Biogas Renewable Generation Project (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq*.). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

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Project Description and Summary

Objective: The City of Glendale (City) proposes the Biogas Renewable Generation Project (Project). The Project's objective is to use the methane-rich landfill gas (LFG) generated by the Scholl Canyon Landfill (SCLF) as fuel to generate 100 percent renewable electrical energy on site. The South Coast Air Quality Management District (SCAQMD) requires the City to collect and control LFG to eliminate direct release of methane from the landfill into the atmosphere. Landfill gas is currently being captured through an existing LFG collection system and combusted in flares at the SCLF pursuant to a permit from the SCAQMD. Rather than continuing to flare LFG, the Project seeks to beneficially use LFG for power generation utility at the SCLF. This would assist the City in meeting and exceeding State requirements for renewable energy generation.

L117-3

The Project includes construction and operation of an approximately 12-megawatt Power Generation Facility, and natural gas and water pipelines.

- Power Generation Facility. The proposed power generation facility would be located adjacent to the existing LFG flare station and would include the following equipment and systems: LFG compressors; LFG treatment system; condensate treatment system; electrical generating equipment; combustion exhaust gas cleanup; continuous emission monitoring systems; electric switchgear; office space; fire protection and safety system; two water tanks; security fencing, and lighting.

- Natural gas pipeline. Approximately two-thirds of a mile (3,500 linear feet) of natural gas pipeline would be constructed to connect the Power Generation Facility to the existing Southern California Gas Company pipeline system located at the eastern end of Scholl Canyon Drive. The Southern California Gas Company pipeline would be a 3-inch, schedule 40 steel gas pipeline located above ground, except at road and drainage culvert crossings, within the boundary of the SCLF.

- Water pipeline. In order to convey water to a new 60,000-gallon water storage tank for fire protection and 10,000-gallon potable water storage tank, an approximately one-mile-long, 12-inch steel or high density polyethylene pipeline would be connected to the existing 16-inch pipeline located north of the SCLF on Glenoaks Boulevard. The water pipeline would be installed above-ground except at road and drainage culvert crossings, and at those locations the water pipeline would be installed below-ground under the roads and either over or under the drainage culvert crossings.

The Project would occur in three phases.

- Phase 1 – Demolition and Removal of Existing Equipment. Four to five months and would entail demolition and removal of existing equipment from the site to make room for the Power Generation Facility. Tanks, piping, electrical systems, fencing, containers, office buildings, and other facilities would be dismantled and removed. The existing concrete foundations and existing asphalt roads would be demolished.

- Phase 2 – Site Grading and Construction. Nine to 10 months and would entail grading, excavation, and site preparation and civil construction. It is anticipated that during the grading process approximately 20,000 cubic yards of soil would be excavated, of

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which 6,000 cubic yards of soil would be used on-site as fill and 14,000 cubic yards of clean soil would be used as cover at the landfill.

- Phase 3 – System Startup. Two to three months would entail sandblasting, priming, and painting the facility, delivery of products/materials, and verifying the operational capabilities of all systems required to make the facility safe and operational.

L117-3

Location: The City proposes to implement the proposed Project within the existing boundaries of the 535-acre SCLF, located at 3001 Scholl Canyon Road in the City of Glendale. Scholl Canyon Landfill is an existing 535-acre Class III nonhazardous landfill facility that accepts municipal solid waste and is not a generator of, or repository for, hazardous wastes. The Project is proposed to be located on a 2.2-acre, non-fill portion of the site, situated on bedrock. The 2.2-acre site is on a portion of the SCLF that is not used for disposal of waste.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the DEIR. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

L117-4

Specific Comments

Comment #1: Impacts to Special Status Plants

Issue #1: The DEIR references rare plant surveys that were performed more than three years ago with only one spring-time survey and during a period of drought. According to the DEIR, focused rare plant surveys were conducted on January 15, 2016; April 15, 2016; and September 8, 2016; followed by one reconnaissance-level survey on April 29, 2019. Page 148 of the DEIR also states, "seasonal rainfall across Southern California from 2015-2017 was extremely limited, which may have reduced the potential to detect sensitive plants within the Proposed Project areas."

L117-5

Issue #2: Page 152 in the DEIR proposes *BIO-4 Conduct Pre-construction surveys,* which appears to defer surveys outside of the CEQA review period. Therefore, the DEIR may not fully identify and disclose potential impacts.

Issue #3: BIO-4 also states, "If federally or State-listed plants are detected in disturbance areas or within 100-feet of the disturbance areas, the City of Glendale would avoid these populations and notify the USFWS [United States Fish and Wildlife Service] and CDFW as appropriate […] if Project activities result in the loss of more than 10 percent of the known individuals within a special-status plant species (List 1.B and List 2 only) occurrence/population to be impacted, the City of Glendale shall consult with USFWS and CDFW regarding the most appropriate conservation strategy for the particular species being impacted." CDFW is concerned with BIO-4 for the following reasons:

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- BIO-4 does not propose to avoid or mitigate for potential impacts to California Rare Plant Rank (CRPR) of 1, 2, 3, or 4 species;
- CDFW would not be consulted until up to ten percent of only CRPR 1 or 2 plant populations in the Biological Study Area are impacted; and,
- BIO-4 would defer mitigation for potential impacts to rare and special-status plants through future consultation instead of preparing a mitigation/conservation plan.

Specific impact: Direct impacts to plants not previously known or identified to be on the Project site or within its vicinity could possibly occur. This may result in mortality, reduced reproductive capacity, population declines, or local extirpation of a sensitive or special status plant. L117-5

Table 1 – Bloom period (highlighted in grey) for rare and special-status plant species that have a Moderate to High potential to occur in the Biological Study Area.

Scientific name	Common name	Jan	Feb	Mar	Apr	May	June	July	Aug	Sep	Oct	Nov	Dec
Asplenium vespertinum	western spleenwort												
Astragalus brauntonii	Braunton's milkvetch												
Berberis nevinii [1]	Nevin's barberry												
Calochortus catalinae	Catalina mariposa lily												
Calochortus clavatus* var. *gracilis	slender mariposa lily												
Calochortus plummerae	Plummer's mariposa lily												
Calochortus weedii* var. *intermedius	intermediate mariposa lily												
Camissoniopsis lewisii	Lewis' evening primrose												
Chorizanthe parryi* var. *parryi	Parry's spineflower												
Dodecahema leptoceras	slender-horned spineflower												
Galium grande [1]	San Gabriel bedstraw												
Lepechinia fragrans	fragrant pitcher sage												
Lepidium virginicum var. *robinsonii*	Robinson's pepper grass												
Lilium humboldtii ssp. *ocellatum*	Humboldt lily												
Malacothamnus davidsonii [1]	Davidson's bush mallow												
Opuntia basilaris* var. *brachyclada [1]	short-joint beavertail												
Phacliea hubbyi	Hubby's phacelia												
Quercus dumosa [1]	Nuttall's scrub oak												
Romneya coulteri	Coulter's matilija poppy												
Rupertia rigida	Parish's rupertia												
Scutellaria bolanderi* ssp. *austromontana	southern mountains skullcap												
Senecio astephanus	San Gabriel ragwort												

Notes:

Bold: plant is California Endangered Species Act or Endangered Species Act listed as endangered or threatened, or ranked 1 or 2 by the California Rare Plant Rank (CNPS 2020a).

[1]: A tree or shrub. Remaining species are annual/perennial herbs or ferns that are more easily or only detectable - if present - during bloom period.

Species listed have a Moderate or High Potential to occur in the Biological Study Area according to Table 23 (pages 120-130) in the Draft Environmental Impact Report.

Bloom period for each species estimated using Calflora's Information on Wild California Plants database (Calflora 2020). May deviate slightly from Blooming Periods listed on Table 23.

Why impacts would occur: CDFW typically considers assessments for rare plants as valid for a period of up to three years, except when significant environmental changes occur such as a wildfire. Plant surveys from 2016 did not include a survey in May and/or June when most rare plants are blooming (Table 1). Accordingly, there may have been missed detections. Botanical surveys conducted during the fall, winter, or ongoing drought conditions (e.g., 2015, 2016, and 2017) during the summer do not maximize detection of rare plants if any are present. The survey on January 15 may have been too early to detect species, particularly annual and perennial herbs. The survey on September 8 may have been too late in the season. A single survey in spring (April 15) may not accurately capture rare population distribution and

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abundance because plants typically emerge at different times throughout its bloom period. Page 148 of the DEIR acknowledges that "Southern California experienced average to above average rainfall in 2018/2019, which provided ideal conditions for species [rare plants] to occur." However, a reconnaissance level survey in 2019, even though in more "ideal" conditions, may have resulted in missed detections because the survey was not a focused rare plant survey.

Preconstruction surveys may not detect rare plants, especially if surveys are performed in the previous fall or winter. Moreover, many rare plants vary annually depending on the timing, duration, and amount of seasonal rainfall. Because of this variation, preconstruction surveys conducted during years of low rainfall inadequate to germinate the species may result in missed detections. For example, for plants with underground bulbs, such as lilies (*Calochortus* genus), the absence of visible above-ground plants may not necessarily be indicative of actual population absence or size. A population may still exist via underground bulbs even when no above-ground individuals are observed (Miller et al. 2004). Also, multiple surveys are necessary to accurately capture where rare plants may occur as they grow and bloom throughout spring. A single preconstruction survey may be insufficient to detect rare plants and determine population distribution. Project construction and activities proceeding after a false-negative preconstruction survey may result in irrevocable damage to a rare plant seedbank. This may cause population declines or local extirpation of a sensitive or special status plant.

L117-5

If rare plants are present, the Project may have direct impacts on rare or special status plant species and seed bank. Indirect impacts may occur from habitat modification or loss. Construction of the two water tanks, security fencing, and engine generator enclosures would impact undisturbed habitat that may support rare plants. The proposed gas pipeline may go through coast live oak woodland (*Quercus agrifolia*) and laurel sumac scrub (*Malosma laurina*) where there may be rare plants. Activities such as vegetation clearing, ground disturbance (e.g., staging, access, grading, excavating), and trampling or crushing from vehicles, equipment, or foot traffic, may have direct impacts on rare plants. Soil compaction and paving may result in permanent loss of rare plant seed bank.

Evidence impacts would be significant: Relying on future surveys is considered deferred mitigation under CEQA. Public Resources Code section 21061 states that a DEIR needs to provide detailed information about the effect which a proposed project is likely to have on the environment. In order to analyze if a project may have a significant effect on the environment, the Project-related impacts, including protocol survey results for rare, California Species of Special Concern (SSC), or CESA-listed species that could occur in the Project footprint need to be disclosed. This disclosure is necessary to allow CDFW to comment on alternatives to avoid impacts, as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution, population trends, and connectivity).

Plants with a CRPR of 1A, 1B, 2A, and 2B are rare throughout their range, endemic to California, and are seriously or moderately threatened in California. All plants constituting CRPR 1A, 1B, 2A, and 2B meet the definitions of CESA and are eligible for State listing (CNPS 2020a). Impacts to these species or their habitat must be analyzed during preparation of environmental documents relating to CEQA, as they meet the definition of rare or endangered (CEQA Guidelines, § 15380). Some CRPR 3 and 4 species meet the definitions of CESA. California Native Plant Society's (CNPS) Rare Plant Ranks page includes additional rank definitions (CNPS 2020a). Impacts to special status plants should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Inadequate

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avoidance, minimization, and mitigation measures for impacts to special status plant species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW recommends two additional season-appropriate, focused rare plant surveys to occur between April and June to sufficiently conclude presence/absence of species listed on Table 23 (DEIR pages 120-130) that have a Moderate or High potential to occur (also see Table 1 above). CDFW recommends surveys be performed according to the following criteria:

- Perform by a qualified botanist familiar with southern California plants;

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- Place emphasis on searching for rare plants where the proposed gas pipeline, two water tanks, security fencing, and engine generator enclosures would disturb natural areas and within 100 feet from these areas. Emphasis should also be placed on all potential staging areas, ingress/egress routes (vehicles, equipment, and workers) and within 100 feet from these areas; and,

- Use CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018).

CDFW recommends providing survey method and results in the final environmental document as updates to the Biological Resources chapter of the environmental document and as an appendix in the form of a survey report. The survey report should provide the following information:

a) A description and map of the survey area. CDFW recommends the map show surveyor(s) track lines to document that the entire site was covered during field surveys.

b) Field survey conditions that should include name(s) of qualified botanists(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched.

c) If rare plants are detected, provide a map(s) showing the location of individual plants or populations, and number of plants or density of plants per square feet occurring at each location. Use appropriate symbology, text boxes, and other map elements to show and distinguish between species found and which plants/populations will be avoided versus impacted by Project construction and activities that would require mitigation.

d) A description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each rare plant or population is found. A sufficient description of biological conditions, primarily impacted habitat, should include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class, density, cover, and abundance of each species).

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e) If rare plants are detected, the report/final environmental document should provide species-specific measures to fully avoid impacts to rare plants (see Mitigation Measure #2 and #3 below). Avoidance measures should be effective, specific, enforceable, and feasible actions. For unavoidable Project impacts, provide species-specific measures to mitigate for impacts to rare plants and habitat (see Mitigation Measure #4).

Mitigation Measure #2: If CRPR 1, 2, 3, or 4 and/or CESA- or ESA-listed plants are detected, the final environmental document should provide species-specific measures to fully avoid impacts to those plants. Avoidance measures should be effective, specific, enforceable, and feasible actions.

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At a minimum, CDFW recommends the City coordinate with a qualified biologist or botanist to establish robust and enforceable protected areas or exclusion zones. An adequate protected area should be established around rare plants and habitat. The perimeter of all protected areas should be adequately demarcated with temporary fencing. Project construction and activities; equipment and material staging; vegetation clearing; equipment refueling; and worker entry should not occur in the protected area. Fencing should be installed in a manner that is not harmful to wildlife. Fences should not have any slack that may cause wildlife entanglement. Prohibited fencing materials include, but are not limited to, spikes, glass, razor, or barbed wire. Signage should be posted near the fencing to inform workers of the sensitivity of the protected areas. The City of Glendale should be responsible for ensuring all perimeter controls are in place prior to commencing any construction, including all equipment staging and import of material. The protection measures should be in place at the end of each working day and for the duration of the Project and maintained for the duration of the Project.

Mitigation Measure #3: Consistent with the DEIR's Mitigation Measure BIO-1 (page 149), CDFW concurs that a qualified biologist should provide a rare plant sensitivity training per a Worker Environmental Awareness Program (WEAP). A qualified biologist should serve as a construction monitor during those periods when Project activities would occur near protect areas to ensure that no inadvertent impacts on rare plants would occur; activities remain within the Project footprint (i.e., outside the demarcated buffer); and flagging is being maintained.

Mitigation Measure #4: If CRPR 1, 2, 3, or 4 and/or CESA- or ESA-listed plants are detected, and the Project cannot feasibly avoid impacting those plants, regardless of the level of impact, CDFW recommends that the City notify CDFW. For impacts to CESA-listed, ESA-listed, CRPR 1, or CRPR 2 plant species, the City should prepare a species-specific mitigation plan. A mitigation plan should be fully developed and executed prior to finalizing the environmental document and prior to any Project construction and activities. The City should develop a plan in consultation with CDFW.

If take of CESA-listed species will occur, CDFW recommends that the City also seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a Consistency Determination in certain circumstances, among other options [Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project

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impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

Recommendation #1: CDFW recommends the City remove BIO-4 from the final environmental document which would rely on preconstruction surveys to avoid or mitigate for potential impacts to rare plants. Instead, CDFW recommends the City consider Mitigation Measures #1 through 4 described above prior to finalizing the environmental document and any Project construction and activities.

Recommendation #2: Following potential consultation with CDFW, CDFW recommends the final environmental document provide the following information describing mitigation for impacts to rare plants:

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a) A map and table showing location of impacts; number of plants impacted by species; acres of habitat impacted; and mitigation ratio applied.

b) Provide species-specific measures for on-site mitigation. Each species-specific mitigation measure, or a robust restoration plan, should adopt an ecosystem-based approach and be of sufficient detail and resolution to describe the following at a minimum: 1) identify the impact and level of impact (e.g., acres or individual plants/habitat impacted); 2) mitigation ration for impacts to number of plants and acres of habitat; 3) location of on-site mitigation and adequacy of the location(s) to serve as mitigation; 4) assessment of appropriate reference sites; 5) scientific [Genus and species (subspecies/variety if applicable)] of plants being used for restoration; 6) location(s) of propagule source; 7) species-specific planting methods (i.e., container or seed); 8) measurable goals and success criteria for establishing self-sustaining populations (e.g. percent survival rate, absolute cover); 9) long-term monitoring, and; 10) adaptive management techniques.

Recommendation #3: CDFW does not consider transplanting or salvaging rare plants within a development as appropriate mitigation for rare plants. Translocation and transplantation are the process of moving an individual plant or animal from the Project site and permanently moving it to a new location. CDFW generally does not support the use of translocation or transplantation as the primary mitigation strategy for unavoidable impacts to CESA-listed species. Studies have shown that these efforts are experimental and the outcome unreliable (CNPS 1998). CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals and their habitats.

Recommendation #4: CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species detected by completing and submitting CNDDB Field Survey Forms (CDFW 2020a).

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Comment #2: Lake Streambed Alteration (LSA) Agreement - Impacts to Aquatic and Riparian Resources

Issue #1: The DEIR acknowledges that direct or indirect impacts to aquatic and riparian resources may occur, warranting an LSA notification.

- Page 150 states, "No vehicles or equipment shall be refueled within 100 feet of an ephemeral drainage or wetland unless a bermed and lined refueling area is constructed." Providing a measure to avoid or minimize impacts suggests that the Project may directly or indirectly impact ephemeral drainages or wetlands.

- Page 159 states, "As required by law, the City would comply with the regulations regarding conducting Project activities in water courses and habitats under the jurisdiction of the State and federal government. Therefore, the City would obtain required permits pursuant to Section 401 and 404 of the CWA, the State Porter-Cologne Act, and Fish and Game Code Section 1605. Due to the importance of jurisdictional habitats and ephemeral/perennial drainages and their suitability to support special-status species, the loss of these habitats associated with the proposed Project would be considered a significant adverse impact requiring mitigation." While this statement alludes to notification pursuant to Fish and Game Code section 1600 *et seq.*, the DEIR does not provide a specific mitigation measure proposing notification.

L117-6

Issue #2: The "Potentially Jurisdictional Drainage Features" map on Figure 3 in the Biological Resources Technical Report (Appendix C) only shows five concrete-lined channels. CDFW is concerned that the map does not show the following features potentially subject to CDFW's broad regulatory authority over streams:

- The map does not include what appears to be ephemeral drainages that may be impact as described on Page 150.

- The map does not include headwater streams despite the following statement on Page 7 of Appendix C, "The National Wetlands Inventory has mapped R4SBA (Riverine, Intermittent, Streambed, Temporary Flooded) habitat within the BSA [Biological Study Area] that consist of the headwaters in the hills along its southern boundary […] the south-facing canyons in this area of the BSA did support conditions indicative of this type of feature, with flows originating from within the BSA entering into the storm drain system adjacent to the Eagle Rock Reservoir and likely ending up in the Arroyo Seco. Additionally, concrete-lined drainage channels were observed throughout the landfill and reclaimed areas that contribute flows to the stormwater conveyance system through Scholl Canyon, downslope of the SCLF, and ultimately into the Verdugo Wash. Based on field observations, the concrete-lined channels and headwaters described above may qualify as United States Army Corps of Engineers (USACE)/Regional Water Quality Control Board (RWQCB) non-wetland waters of the U.S. and/or California Department of Fish and Wildlife (CDFW) jurisdictional waters."

- The map does not include a 0.13-acre Freshwater Pond that the National Wetlands Inventory has mapped PUSAx (Palustrine, Unconsolidated Shore, Temporary Flooded, Excavated). The wetland feature falls within the Biological Study Area.

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Specific impact: Hydrologic processes and waterbodies may be impacted by the Project. Vegetation removal and ground disturbing activities (e.g., excavating, demolition, grading, and infill) may increase the amount of sediment, debris, and pollutants in the landscape, which may be transported downstream and impair waterbodies. This may impact special status species directly or indirectly through habitat modifications or habitat loss.

Why impacts would occur: The Project is located at the Scholl Canyon Landfill which is situated at a high elevation, surrounded by foothills and valleys. The south-facing canyons support headwater streams, "with flows originating from within the BSA entering into the storm drain system adjacent to the Eagle Rock Reservoir and likely ending up in the Arroyo Seco" (page 7 of Appendix C). Installation of engine generator enclosure, natural gas pipeline, and two large water tanks may require vegetation to be removed and soil to be excavated on south-facing slopes. In particular, the area proposed for the two large water tanks is a very steep hilltop that may require extensive digging and landscape recontouring in order to accommodate a 10,000- and 60,000-gallon water tank. Project construction on south-facing slopes may result in the discharge of sediment and fill; increase erosion and sediment transport; and degrade water quality, thereby impairing headwater streams and downstream waterbodies.

L117-6

Evidence impacts would be significant: The Project may impact aquatic and riparian resources, which absent specific mitigation, could result in substantial erosion or siltation on site or downstream of the Project.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW has concluded that the Project may result in the alteration of streams. For any such activities, the Project applicant (or "entity") must provide notification to CDFW pursuant to Fish and Game Code, section 1600 *et seq*. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. Please visit CDFW's Lake and Streambed Alteration Program webpage to for information about LSA notification and online submittal through the Environmental Permit Information Management System (EPIMS) Permitting Portal (CDFW 2020b).

CDFW's issuance of an LSA for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from the City of Glendale for the Project. To minimize additional requirements by CDFW pursuant to Fish and Game Code, section 1600 *et seq*. and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA.

Any LSA permit issued for the Project by CDFW may include additional measures protective of streambeds on and downstream of the Project site. The LSA may include further erosion and pollution control measures. To compensate for any on-site and off-site impacts to riparian resources, additional mitigation conditioned in any LSA may include the following: avoidance of resources, on-site or off-site creation, enhancement or restoration, and/or protection, and management of mitigation lands in perpetuity.

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Mitigation Measure #2: CDFW recommends the LSA notification include a hydrology report to evaluate both above and below ground sections of any pipeline that would cross streams and concrete lined channels. The hydrology report should also include a scour analysis to demonstrate that stream banks and channel would not erode.

L117-6

Recommendation #1: "Potentially Jurisdictional Drainage Features" map should evaluate all rivers, streams, and lake including culverts, ditches, storm channels that may transport water, sediment, and pollutants and discharge into rivers, streams, and lakes. CDFW recommends the City update its map of jurisdictional wetlands to include all headwater streams; ephemeral and intermittent streams; and ponds.

Comment #3: Impacts to Vegetation Communities

Issue #1: The Project would impact 3.37 acres of laurel sumac scrub (*Malosma laurina* Shrubland Alliance) and 0.22 acres of California sagebrush-California buckwheat scrub (*Artemisia californica-Eriogonum fasciculatum* Shrubland Alliance).

Issue #2: BIO-7 proposes that "the compensation for the loss of habitats may be achieved either by […] off-site creation or enhancement of California sycamore woodlands and southern riparian scrub communities."

Specific impact: The Project would result in permanent loss of 3.37 acres of laurel sumac scrub and 0.22 acres of California sagebrush-California buckwheat scrub. These communities could provide habitat for special status plant and wildlife species. CDFW agrees with Mitigation Measure BIO-7 which proposes to restore native vegetation communities impacted by the Project. However, CDFW is concerned that creation or enhancement of California sycamore woodlands and southern riparian scrub communities would not mitigate for native vegetation communities impacted by the Project. The proposed mitigation measure of 1:1 for temporary impacts and 2:1 for permanent impacts may not be sufficient.

L117-7

Why impacts would occur: The Project would remove 3.37 acres of laurel sumac scrub and 0.22 acres of California sagebrush-California buckwheat scrub. Laurel sumac scrub and California sagebrush-California buckwheat scrub are declining at a local and regional level. These two vegetation communities could provide habitat for special status plants and wildlife species. Impacts to special status plants and wildlife species may occur through habitat loss or modification, resulting in reduced reproductive capacity, population declines, or local extirpation of a sensitive or special status plant or wildlife species.

Evidence impacts would be significant: CDFW considers plant communities, alliances, and associations with a statewide ranking of S1, S2, S3 and S4 as sensitive and declining at the local and regional level (Sawyer et al. 2008). An S3 ranking indicates there are 21 to 80 occurrences of this community in existence in California, S2 has 6 to 20 occurrences, and S1 has less than 6 occurrences. Laurel sumac scrub and California sagebrush-California buckwheat scrub has a Global Rank of G4 and a State Rank of S4. While both vegetation communities are not rare, a G4-S4 ranking considers these communities uncommon and declining at the local and regional level.

Habitat creation to mitigate for impacts to sensitive vegetation communities may be unsuccessful when mitigation does not account for abiotic and biotic components of a

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vegetation community. Abiotic variables such as hydrologic regime, soil type, microclimate, slope, aspect, and elevation determine where a vegetation community occurs. Vegetation communities are not merely plants but also consists of pollinators and microscopic biota such as detritovores, cyanobacteria, lichens, algae, and microfungi. Abiotic and biotic variables are rarely considered during mitigation site selection or when developing a conservation plan. This may result in a project never being able to replace the vegetation community that was impacted (Godefroid et al., 2010; Sudol and Ambrose 2002).

Furthermore, habitat restoration/creation may create more favorable conditions for non-native, invasive plants through use of soil amendments, fertilizer, and irrigation. Non-native, invasive plants may outcompete plantings. Lastly, poor site selection may lead to unsuccessful mitigation. This may occur when a selected site is not appropriate for the vegetation community being created. This may also occur when a selected site is adjacent to development. The restoration site may be degraded over time because of anthropogenic pressures such as encroachment, brush clearance, trampling, and water diversion.

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Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive vegetation communities will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW recommends that the City restore or create habitat on or off site at no less than 3:1 for permanent impacts to 3.21 acres of laurel sumac scrub and 0.22 acres of California sagebrush-California buckwheat scrub. For mitigation through participation in a mitigation bank, CDFW recommends no less than 2:1 for permanent impacts for both vegetation communities.

CDFW's recommended ratio is higher to account for loss of seed bank and risk of failure. High attrition and low survivorship of native seedlings may occur. Moreover, the ratio is higher to account for the temporal loss of habitat. This may be multiple years, from the moment of impact to until the City is able to restore/create self-sustaining habitat that is similar in species abundance, composition, density, and coverage to the habitat impacted.

Mitigation Measure #2: CDFW recommends modifying BIO-7 – subject to change to reflect final mitigation plans – by removing the language with strikethrough and including the underlined language:

This Project would impact 3.37 acres of laurel sumac scrub (*Malosma laurina* Shrubland Alliance) and 0.22 acres of California sagebrush-California buckwheat scrub (*Artemisia californica-Eriogonum fasciculatum* Shrubland Alliance). The compensation for the loss of habitats shall be achieved by [list specific mitigation plan action (i.e., on or off-site mitigation or participation in a mitigation bank]. Temporarily impacted communities shall be restored at a mitigation ratio of 1:1. Permanent impacts to impacted communities shall be 3:1 for on- or off-site habitat restoration or creation, or 2:1 for participation in an established mitigation bank program.

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Prior to any Project construction or activities, including equipment staging, mobilization, and grading, ~~Prior to the removal of native vegetation, if on- or off-site mitigation is required,~~ an ecosystem-based Habitat Mitigation and Monitoring Plan shall be prepared that will guide all restoration and monitoring activities. A Habitat Mitigation and Monitoring Plan shall be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. This plan shall include, at a minimum, the following:

- Provide the total acreage of unique sensitive vegetation communities impacted, and abundance, density, and cover of each plant species and vegetation layer impacted (i.e., ground cover, forbs, subshrub, shrub, and tree).
- Provide the specific location of on- and/or off-site mitigation area(s) and a science-based discussion as to why the mitigation area(s) is appropriate for mitigating Project-related impacts. Describe the area(s) environmental features (i.e., soils, slope, existing vegetation, hydrology) that would suggest the mitigation area(s) can support the vegetation and wildlife impacted by Project activities.
- Provide a vegetation survey conducted at a reference site containing the vegetation communities being mitigated, with as good or better quality habitat, to document the density, abundance, diversity, and percent cover for each species by vegetation layer.

L117-7

- A schematic depicting the mitigation area.
- Proposed species list for creation/enhancement. A plant palette shall consist of species that are diverse with respect to growing duration (annual, perennial), life form (grasses, shrubs, trees, vines), and structure (ground cover, shrubs, tree canopy) that form the vegetation alliance that is being mitigated.
- Planting/seeding methodology (e.g., sources of local propagules, container sizes, and seeding rates).
- Planting schedule
- Irrigation plan
- Weeding schedule and invasive plant control methods that reduces or eliminates the use of chemicals.
- Success criteria
- Monitoring methodology and schedule extended across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.
- Reporting requirements

Mitigation Measure #3: CDFW recommends habitat restoration or creation in areas suitable to support plant species found in laurel sumac scrub and California sagebrush-California buckwheat scrub. In the Biological Study Area, both vegetation communities occur on south or southwest facing slopes. Mitigation should not occur on where physical and/or biological factors (e.g., soils, slope) are not suitable to support laurel sumac scrub and California sagebrush-California buckwheat scrub. Additionally, any on-site mitigation should not occur in or immediately adjacent to areas of dense Fountain grass (*Pennisetum setaceum*) or non-native annual grasses (e.g., wild oat, *Avena barbata*). Fountain grass could spread into restoration areas and impact mitigation efforts. Plants found in California sagebrush-California buckwheat scrub may decrease over time with increased presence of non-native grasses (Sawyer et al. 2008).

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Mitigation Measure #4: Prior to any Project construction and activities, CDFW recommends that the perimeter of the 3.37 acres of laurel sumac scrub and California sagebrush-California buckwheat scrub be clearly delineated by temporary stakes, flags, or other clearly identifiable system. Fencing should be accompanied by signage. During WEAP, workers should be advised not to cut, clear, pull, or trample vegetation; toss or pile debris and garbage; or otherwise impact vegetation beyond the demarcated area. This could protect native plants, habitat, and any special status plants and wildlife, and prevent additional impacts to biological resources and soils on south-facing slopes beyond impacts identified by the Project/environmental document. Temporary fencing and signage should be maintained for the duration of the Project and removed after Project construction and activities are completed.

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Recommendation #1: CDFW recommends the final environmental document provide a map showing an accurate location and footprint of where temporary and permanent impacts to a total of 3.37 acres of laurel sumac scrub and 0.22 acres of California sagebrush-California buckwheat scrub will occur.

Recommendation #2: CDFW recommends BIO-7 remove the following language “off-site creation or enhancement of California sycamore woodlands and southern riparian scrub communities.” CDFW recommends that language be replaced with a specific mitigation plan to compensate for impacts to laurel sumac scrub and California sagebrush-California buckwheat scrub.

Recommendation #3: Page 156 of the DEIR states, “the proposed Project would result in 8.01 acres of permanent and 2.06 acres of temporary disturbance to vegetation communities […] Just over 96 percent of these impacts would be to non-native communities or developed/disturbed lands.” According to Table 25 on page 157, 3.37 acres of laurel sumac scrub and 0.22 acres of California sagebrush-California buckwheat scrub would be impacted. A total of 3.59 acres of native vegetation communities would be impacted which is approximately 36 percent of total impacts to vegetation. Approximately 6.48 acres (64 percent) would be to non-native communities or developed/disturbed lands, not 96 percent. Based on these calculations, the final environmental document should reevaluate percent of impacts to vegetation communities to more accurately document and disclose Project related impacts.

Recommendation #4: BIO-7 proposes 2:1 and 3:1 for temporary and permanent impacts, respectively, to jurisdictional wetlands; however, no wetlands or riparian vegetation communities were mapped in the Biological Study Area or impacts documented in the DEIR (e.g., Table 25). If no impacts would occur, CDFW recommends that BIO-7 be updated accordingly.

If wetlands or riparian vegetation communities were mapped but not included in the DEIR (e.g., riversidian alluvial fan sage scrub, southern oak riparian forest), CDFW recommends the City update the Vegetation Communities and Landcover Types map (i.e., Figure 2) and Table 25, Proposed Project Impacts to Vegetation Communities and Land Cover Types.

If the Project will impact wetlands or riparian vegetation communities, CDFW recommends that the final environmental document clearly and accurately document what acres impacted by wetland vegetation community and provide a map showing where impacts will occur. The City should provide mitigation appropriate to the vegetation community impacted and comparable to the Project’s level of impact. Wetlands, which includes streams, rivers, and creeks provide important food, nesting habitat, cover, and migration corridors for wildlife, but many, at a local

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and state level are deteriorating or have been degraded. Some wetland vegetation communities have a State Rank of S1, S2, or S3, which are considered highly imperiled and sensitive vegetation communities (Sawyer et al. 2008).

L117-7 If there will be impacts, the City should develop an ecosystem-based on- or off-site restoration plan as described under Mitigation Measure #2 above. The City should consult with CDFW and develop a final plan prior to any Project construction or activities. CDFW also recommends the City of Glendale submit an LSA notification as described under Comment #2. Notification should occur after the City has updated the final environmental document to disclose potential impacts to aquatic and riparian resources.

Comment #4: Impacts to Coast live oak trees and trees (general)

Issue: A portion of the proposed gas pipeline will be installed near coast live oak woodland (*Quercus agrifolia*) and "Ornamental woodland". While tree removal is not proposed for the Project, the critical root zone of trees may be impacted by construction and activities associated with pipeline installation. CDFW is concerned that the DEIR does not propose measures to avoid all impacts to the critical root zone of trees.

Specific impact: Impacts to the critical root zone of coast live oak trees may lead to the loss of oak trees. Impacts to trees may result in short-term or long-term reduction in available nesting and perching habitat and structure for birds.

L117-8

Why impacts would occur: Trees may be impacted by heavy vehicles and equipment and other activities (e.g., trenching, digging) related to gas pipeline installation. The placement of fill dirt and ingress and egress routes of heavy construction vehicles can continually compact the root zone and roots may not be able to acquire nutrients, water, and oxygen, causing the tree to die (Hostetler and Drake 2009). Designated zones for disposal of debris and chemicals should be away from any trees. Debris can be toxic or can change soil pH due to leeching of chemicals into the ground which could affect trees (Hostetler and Drake 2009).

The Project may reduce the footprint of available nesting and perching habitat and structure for birds in the short-term and potentially long-term if the Project is inadequate in mitigating for impacts to trees. Even if replacement coast live oak trees survive, oak tree saplings could remain small and shrubby for many years. It may take 20 to 40 years, potentially longer under drought conditions, for replacement oak trees to reach maturity and restore the habitat, structure, foliage, and canopy lost by removing coast live oak trees. As such, birds may be unable to nest in planted coast live oak trees until they mature.

Evidence impact would be significant: CDFW considers oak trees as sensitive natural communities. CDFW considers plant communities, alliances, and associations with a statewide ranking of S1, S2, S3, and S4 as sensitive and declining at the local and regional level (Sawyer et al. 2008). The Project may have direct or indirect effects to these sensitive species.

Additionally, the loss of occupied habitat or reductions in the number of sensitive and special-status bird species, either directly or indirectly through nest abandonment or reproductive suppression, would constitute a significant impact absent appropriate mitigation.

Recommended Potentially Feasible Mitigation Measure(s):

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Mitigation Measure: To protect trees not targeted for removal, CDFW recommends the following mitigation measure:

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"Project construction and activities including (but not limited to) construction traffic, staging areas, debris piles, trenching, excavation, and soil compaction, shall not occur within a tree's drip line or a tree's Critical Root Zone (CRZ). Prior to any Project construction and activities that could impact trees, particularly coast live oak trees, the City of Glendale shall conduct a site visit with a certified arborist to identify trees that could be impacted. The City of Glendale, in consultation with a certified arborist, shall prepare a plan to protect the CRZ of trees that may be impacted. The City of Glendale/certified arborist shall also identify any trees that may need to be cut or limbed or require roots (i.e., tap root, main roots, and any surface-feeding roots) to be disturbed. At a minimum, the plan shall implement temporary fencing installed around the CRZ of any tree that may be impacted. Fencing shall be maintained for the duration of the Project and removed after all Project construction is completed.

If roots or canopy of coast live oak trees must be cut or disturbed, actions shall be performed by a certified arborist or under the supervision of a certified arborist. If substantial impacts to roots and canopy of trees occur that will lead to decreased health of mortality of a tree, coast live oak trees shall be replaced at a minimum ratio of 4:1. Non-native, ornamental trees shall be replaced with native species at no less than 2:1. The City of Glendale shall develop a Mitigation, Monitoring, and Reporting plan in consultation with a certified arborist and/or qualified restoration professional, the City of Glendale's Arborist Technician under the City's Indigenous Tree Ordinance, and the California Department of Fish and Wildlife."

Comment #5: Impacts to Crotch Bumble Bee

Issue: Page 131 states, "While suitable food plants for one CDFW Special Animal, Crotch bumble bee (*Bombus crotchii*), occur within the BSA the most recent recorded occurrence is approximately 4.2 miles to the northeast and is more than 20 years old; this species has a low potential of occurrence within the BSA." The biological surveys did not include focused surveys for Crotch bumble bee by a qualified entomologist familiar with the species. Additionally, the lack of current records is likely due to an absence of focused surveys. Until recently focused surveys for Crotch bumble bee were not required for projects.

L117-9

Specific impact: Project ground disturbing activities such as grading, excavation, and soil compaction may result in crushing or filling of active bee colonies, causing the death or injury of adults, eggs, and larvae; burrow collapse, nest abandonment, and reduced nest success. The Project may remove bee habitat by eliminating native vegetation that may support essential foraging habitat.

Why impacts would occur: Native vegetation and habitat on the south-facing slopes within the Biological Study Area provide suitable habitat for Crotch bumble bee. Crotch bumble bee has been documented to occur within the vicinity of the Project area. Suitable Crotch bumble bee habitat includes areas of grasslands and upland scrub that contain requisite habitat elements, such as small mammal burrows. Crotch bumble bee primarily nest in late February through late October underground in abandoned small mammal burrows, but may also nest under perennial bunch grasses or thatched annual grasses, under brush piles, in old bird nests, and in dead trees or hollow logs (Williams et al. 2014; Hatfield et al. 2018). Overwintering sites utilized by Crotch bumble bee mated queens include soft, disturbed soil (Goulson 2010), or under leaf litter

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or other debris (Williams et al. 2014). Therefore, ground disturbance and vegetation removal associated with Project implementation has the potential to significantly impact Crotch bumble bee populations. Project disturbance activities could result in mortality or injury to hibernating bees, as well as temporary or long-term loss of suitable foraging habitats. Construction during the breeding season of bees could result in the incidental loss of breeding success or otherwise lead to nest abandonment.

Evidence impact would be significant: On June 12, 2019, ~~CDFW~~ the California Fish and Game Commission accepted a petition to list the crotch bumble bee as endangered under the California Endangered Species Act ("CESA"), determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. The Project's potential to substantially reduce and adversely modify habitat for Crotch's bumble bee, reduce and potentially seriously impair the viability of populations of Crotch's bumble bee, and reduce the number and range of the species while taking into account the likelihood that special status species on adjacent and nearby natural lands rely upon the habitat that occurs on the proposed Project site.

L117-9

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure: Due to suitable habitat within the Project site, within one year prior to vegetation removal and/or grading, a qualified entomologist familiar with the species behavior and life history should conduct surveys to determine the presence/absence of Crotch's bumble bee. Surveys should be conducted during flying season when the species is most likely to be detected above ground, between March 1 to September 1 (Thorp et al. 1983). Survey results including negative findings should be submitted to CDFW prior to initiation of Project activities. If "take" or adverse impacts to Crotch's bumble bee cannot be avoided either during Project activities or over the life of the Project, the City of Glendale must consult CDFW to determine if a CESA incidental take permit is required (pursuant to Fish & Game Code, § 2080 *et seq.*).

Comment #6: Impacts to California Coastal Gnatcatcher

Issue: Page 107 of the DEIR states that reconnaissance-level surveys were performed in "October/November 2015, January/April/September 2016, and July 2017 […]. The primary goal of the surveys was to identify and assess habitat that may be capable of supporting special status plant or wildlife species and to determine the potential need for additional focused surveys for special-status resources." Page 132 of the DEIR states, "while limited suitable habitat (coastal sage scrub; [*Artemisia californica*]) is present in the BSA the federally threatened and California Species of Special Concern coastal California gnatcatcher (*Polioptila californica californica*; [gnatcatcher]) is not expected to occur on the site; the nearest recorded occurrence is approximately eight miles to the east from over 20 years ago."

L117-10

CDFW is concerned that a species-specific protocol survey was not performed to conclude presence/absence of gnatcatcher, despite the presence of suitable habitat, regardless of how "limited" that habitat may be in the Biological Study Area. CDFW is also concerned that the DEIR/biological survey may not have evaluated the potential for the gnatcatcher to occur in areas adjacent to "suitable habitat areas."

Specific impact: If gnatcatchers are present, but reconnaissance surveys missed detecting the gnatcatcher, Project construction and activities could result in increased nesting mortality due to

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nest abandonment or decreased feeding frequency.

Why impacts would occur: Construction during the breeding season for gnatcatchers could result in the loss of fertile eggs or nestlings or otherwise lead to nest abandonment. Impacts could result from noise disturbances, increased human activity, dust, vegetation clearing, ground disturbing activities (e.g., staging, access, excavation, grading), and vibrations caused by heavy equipment. Project construction and activities occurring adjacent to California sagebrush scrub may impact breeding and nesting gnatcatchers. While the gnatcatcher's association with coastal sagebrush scrub (CSS) is well documented, the gnatcatcher could be found in other vegetation community types when these "non-CSS" community types are located adjacent to CSS (Bontrager 1991; Campbell et al 1998). For this reason, the USFWS survey protocol for the gnatcatcher applies to proposed projects that may contain "contain coastal sage scrub, alluvial fan scrub, chaparral, or intermixed or adjacent areas of grassland and riparian habitats, and is located within the range of this species" (USFWS 1997).

L117-10

Evidence impacts would be significant: Inadequate avoidance, minimization, and mitigation measures for impacts to special status wildlife species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW recommends a species-specific, protocol survey be performed to determine presence/absence of coastal California gnatcatcher and any project construction and activities, including equipment staging, mobilization, and grading. Surveys should be performed in accordance to USFWS Coastal California Gnatcatcher Presence/Absence Survey Guidelines (USFWS 1997). CDFW also recommends the City prepare and provide a survey report including negative findings (i.e., absence/no detection) to the USFWS and CDFW for review within 45 days as described in the survey protocol.

Mitigation Measure #2: If coastal California gnatcatcher is detected/present, CDFW recommends the City of Glendale consult with CDFW to identify appropriate avoidance and mitigation measures. Avoidance and mitigation measures, which may include a gnatcatcher-specific Habitat Mitigation, Monitoring, and Reporting plan, should be fully developed prior to any project construction and activities.

Comment #7: Impacts to Species of Special Concern

Issue: Table 24 on page 132 lists the following species as having a High or Moderate potential of occurring in the Biological Study Area: southern California legless lizard (*Anniella stebbinsi*); California glossy snake (*Arizona elegans occidentalis*); coastal whiptail (*Aspidoscelis tigris stejnegeri*); coast horned lizard (*Phrynosoma blainvillii*); and San Diego desert woodrat (*Neotoma lepida intermedia*). The survey did not detect these species but offered the following caveat with respect to reptiles, "Many reptile species, even if present, are difficult to detect because they are cryptic and their life history characteristics limit their ability to be observed during most surveys" (page 117).

L117-11

The DEIR provides Mitigation Measure BIO-3, Implement Biological Construction Monitoring,

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and BIO-6 Terrestrial Herpetofauna Monitoring, to avoid or minimize impacts to "special-status plants, terrestrial mammals, reptiles, and birds." CDFW appreciates the intention of BIO-3 and BIO-6 but is concerned that the measures do not provide enough specificity to avoid or minimize impacts to special status species, specifically Species of Special Concern.

Specific impact: Direct impacts to SSC could result from Project construction and activities (e.g., equipment staging, mobilization, and grading); ground disturbance; vegetation clearing; and trampling or crushing from construction equipment, vehicles, and foot traffic. Indirect impacts could result from temporary or permanent loss of suitable habitat.

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Why impacts would occur: Without appropriate species-specific avoidance measures, biological construction monitoring may be ineffective for detecting SSC. This may result in trampling or crushing of SSC. Demolition and paving after false negative conclusions may trap wildlife hiding under refugia and burrows.

Evidence impacts would be significant: CEQA provides protection not only for CESA- and ESA-listed species, but for any species including but not limited to SSC. CDFW considers impacts to SSC a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. Take of SSC could require a mandatory finding of significance by the Lead Agency (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure(s): CDFW recommends the City of Glendale include SSC-specific mitigation measures in the final environmental document. CDFW recommends Mitigation Measures #1 through 5, which incorporates language from BIO-1 (Worker Environmental Awareness Program), BIO-3, and BIO-6, and includes new language that is underlined.

Mitigation Measure #1: Scientific Collecting Permit – CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). Please visit CDFW's Scientific Collection Permits webpage for information (CDFW 2020c).

Pursuant to the California Code of Regulations, title 14, section 650, the City of Glendale/qualified biologist must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities. The Lake and Streambed Alteration Agreement may provide similar take or possession of species as described in the conditions of the agreement

Mitigation Measure #2: Species surveys - The City of Glendale should retain a qualified biologist with experience surveying for southern California special status wildlife species. Prior to commencing any project construction and activities, including equipment and material staging, the qualified biologist should conduct surveys for where suitable habitat is present and directly impacted by project construction and activities, and construction equipment and vehicle access and parking. Surveys should place an emphasis towards identifying any Species of Special Concern (SSC) including (but not limited to) the southern California legless lizard;

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California glossy snake; coastal whiptail; coast horned lizard; and San Diego desert woodrat. Focused surveys should consist of a minimum of three daytime surveys and one nighttime survey no more than 7 days from the start of any project construction and activities.

If SSC are detected, the qualified biologist should use visible flagging to mark the location where SSC was detected. The qualified biologist should take a photo of each location, map each location, and provide the specific species detected at that location. Flagging should be maintained for the duration of the project. The qualified biologist should provide a summary report of herpetofauna surveys to the City of Glendale before any demolition, paving, soil compaction, and vegetation clearing work occurs.

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Mitigation Measure #3: Relocation Plan - The qualified biologist should prepare a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas. The list (or plan) of protocols should be implemented during project construction and activities/biological construction monitoring. The City of Glendale/qualified biologist may consult with CDFW to prepare species-specific protocols for proper handling and relocation procedures.

Mitigation Measure #4: Worker Training and Field Protocols - During project construction and activities, the qualified biologist should have prepared a map showing locations where SSC were detected and share this information to workers as part of the Worker Environmental Awareness Program (WEAP). The qualified biologist should communicate to workers that upon encounter with a SSC, work must stop, a qualified biologist must be notified, and work may only resume once a qualified biologist has determined that it is safe to do so. Any contractor or employee that inadvertently kills or injures a special-status animal, or finds one either dead, injured, or entrapped, should immediately report the incident to the qualified biologist and/or on-site representative identified in the WEAP.

Monitoring by a qualified biologist will occur continuously during all ground disturbance work (i.e., demolition, paving, soil compaction, and grading), vegetation removal, and installation of the portion of the gas pipeline occurring in densely vegetated areas. Surveys for SSC should be conducted prior to the initiation of each day of vegetation removal activities in suitable habitat. Surveys for SSC should be conducted in the areas flagged in earlier surveys before construction and activities may occur in or adjacent to those areas. Work may only occur in these areas after a qualified biologist has determined it is safe to do so. Even so, workers should be advised to work with caution near flagged areas. Once all ground disturbance work, vegetation removal, and pipeline installation are complete, monitoring will occur periodically for the duration of the project. If SSC is encountered, qualified biologist should safely relocate the animal per relocation and handling protocols.

Mitigation Measure #5: Injured or Dead Wildlife - If any SSC are harmed during relocation or a dead or injured animal is found, work in the immediate area should stop immediately, the qualified biologist should be notified, and dead or injured wildlife documented immediately. The qualified biologist should contact the USFWS, CDFW, and the City of Glendale by telephone by the end of the day, or at the beginning of the next working day if the agency office is closed. In addition, a formal report should be sent to the City of Glendale, CDFW, and USFWS (as appropriate) within three calendar days of the incident or finding. The report should include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Injured animals should be taken immediately to

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the nearest appropriate veterinary or wildlife rehabilitation facility. The qualified biologist should, immediately upon finding the remains or injured animal, coordinate with the on-site construction foreman to discuss the events that caused the mortality or injury, if known, and implement
L117-11 measures to prevent future incidents. Details of these measures should be included with the report. Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death. Species remains should be collected and frozen as soon as possible, and CDFW and USFWS, as appropriate, should be contacted regarding ultimate disposal of the remains.

Comment #8: Impacts to Nesting Birds

Issue: BIO-5 uses buffers to minimize impacts rather than fully avoiding impacts to nesting birds.

Specific impact: Increased nesting mortality due to nest abandonment or decreased feeding frequency as a result of Project construction and activities.

Why impacts would occur: Construction during the breeding season for nesting birds could result in the loss of fertile eggs or nestlings or otherwise lead to nest abandonment. Impacts could result from noise disturbances, increased human activity, dust, vegetation clearing, ground disturbing activities (e.g., staging, access, excavation, grading), and vibrations caused by heavy equipment.

Evidence impacts would be significant: Nests of all birds and raptors are protected under State laws and regulations, including Fish and Game Code, sections 3503 and 3503.5. Take or possession of migratory nongame birds designated in the Federal Migratory Bird Treaty Act of
L117-12 1918 (Code of Federal Regulations, Title 50, § 10.13) is prohibited under Fish and Game Code section 3513. The loss of occupied habitat or reductions in the number of sensitive and special-status bird species, either directly or indirectly through nest abandonment or reproductive suppression, would constitute a significant impact absent appropriate mitigation.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure: CDFW recommends modifying Mitigation Measure BIO-5 to fully avoid impacts to nesting birds by conditioning the environmental document to provide the following language: “Project construction, equipment staging, mobilization, grading, ground disturbance activities, and vegetation removal shall be completed outside the avian breeding season. The City of Glendale will not perform any Project construction or activities or remove or otherwise disturb vegetation on the project site from February 15 to August 31, and as early as January 1, to avoid impacts to breeding/nesting birds and raptors.”

Comment #9: Impacts to Bats

Issue: Page 108 states, “it should be noted that some wildlife species and/or individuals may have been difficult to detect due to their elusive nature, cryptic morphology, or nocturnal
L117-13 behavior. Surveys were conducted during daylight hours when temperatures were such that reptiles and other wildlife would be active (i.e., between 65-95° Fahrenheit).” Moreover, page 132 states, “a suite of special-status mammals, all California Species of Special Concern or CDFW Special Animals, having the potential to occur in the BSA include (but are not limited to)

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pallid bat (*Antrozous pallidus*), western mastiff bat (*Eumopos perotis californicus*) […]". CDFW is concerned that daytime biological surveys may not have detected bats if any are present.

Specific impact: Direct impacts include removal of trees, vegetation, and/or structures that may provide roosting habitat and therefore has the potential for the direct loss of bats. Indirect impacts to bats and roosts could result from increased noise disturbances, human activity, dust, vegetation clearing, ground disturbing activities (e.g., staging, access, mobilization, and grading), and vibrations caused by heavy equipment. Demolition, grading, and excavating activities may impact bats potentially using man-made structures or surrounding trees as roost sites.

Why impacts would occur: In urbanized areas, bats use trees and man-made structures for daytime and nighttime roosts (Avila-Flores and Fenton 2005; Oprea et al. 2009; Remington and Cooper 2014). The west-facing slopes of the Biological Study Area contains 31.75 acres of Ornamental woodland and 2.95 acres of Coast live oak woodland (see Table 25 page 157). Trees found in these vegetation communities could provide roosting habitat for bats. Bats can fit into very small seams, as small as a ¼ inch. Crevices in buildings and other man-made structure in and adjacent to the Project site could provide roosting habitat for bats. The pallid bat and western mastiff bat may roost in trees, hollow trees, and buildings.

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Modifications to roost sites can have significant impacts on the bats' usability of the roost and can impact the bats' fitness and survivability (Johnston et al. 2004). Extra noise and vibration can lead to the disturbance of roosting bats which may have a negative impact on the animals. Human disturbance can also lead to a change in humidity, temperatures, or the approach to a roost that could force the animals to change their mode of egress and/or ingress to a roost. Although temporary, such disturbance can lead to the abandonment of a maternity roost (Johnston et al. 2004).

Evidence impacts would be significant: Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). Pallid bat and western mastiff bat, including additional bat species, considered California Species of Special Concern and meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15065). Take of SSC could require a mandatory finding of significance by the Lead Agency (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW recommends a qualified bat specialist conduct bat surveys within the Biological Study Area (plus a 100-foot buffer as access allows) in order to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. CDFW recommends using acoustic recognition technology to maximize detection of bats. Night roosts are typically utilized from the approach of sunset until sunrise. Maternity colonies, composed of adult females and their young, typically occur from spring through fall.

A discussion of survey results, including negative findings, should be provided in the final environmental document. Depending on survey results (e.g., Species of Special Concern observed, roosts are detected,), the DEIR should discuss potentially significant effects of the proposed Project on the bats and include species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125).

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Mitigation Measure #2: If the City determines that trees will need to be removed for installation of the gas or water pipelines, CDFW recommends the City condition the final environmental document with the following language to reduce potential Project impacts to less than significant:

"If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year and could roost in trees, trees shall be pushed down using heavy machinery rather than felling it with a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees shall be pushed lightly two to three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree shall then be pushed to the ground slowly and remain in place until it is inspected by a bat specialist. Trees that are known to be bat roosts shall not be bucked or mulched immediately. A period of at least 24 hours, and preferably 48 hours, shall elapse prior to such operations to allow bats to escape."

Mitigation Measure #3: If maternity roosts are found, CDFW recommends the City condition the final environmental document with the following language to reduce potential Project impacts to less than significant: "If maternity roosts are found, to the extent feasible, work shall be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are not yet ready to fly out of the roost (March 1 to September 30)."

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Mitigation Measure #4: If maternity roosts are found and the City determines that trees will need to be removed for installation of the gas or water pipelines, CDFW recommends the City condition the final environmental document with the following language to reduce potential Project impacts to less than significant: "If maternity roosts are found and trees must be removed during the maternity season, a qualified bat specialist shall conduct a preconstruction survey to identify those trees proposed for disturbance that could provide hibernacula or nursery colony roosting habitat. Acoustic recognition technology shall be used to maximize detection of bats. Each tree identified as potentially supporting an active maternity roost shall be closely inspected by the bat specialist no more than 7 days prior to tree disturbance to determine the presence or absence of roosting bats more precisely. If maternity roosts are detected, trees determined to be maternity roosts shall be left in place until the end of the maternity season. Work shall not occur within 100 feet of or directly under or adjacent to an active roost and work shall not occur between 30 minutes before sunset and 30 minutes after sunrise."

Additional Recommendations

Recommendation #1: Fire clearance

CDFW recommends the final environmental document provide a measure to protect native vegetation communities adjacent to areas of permanent impacts that may need to be routinely brushed to maintain sufficient fire clearance requirements. The City of Glendale should consider a form of permanent wildlife-safe fencing or mechanism that would clearly mark the perimeter of the clearance footprint. This could help prevent additional impacts to native vegetation communities outside of the clearance footprint so long as the Power Plant Facility is in operation and brush clearance is required. Native plants, habitat, and special status plants and wildlife could be impacted if workers cut, clear, pull, or trample vegetation; toss or pile debris and garbage; or otherwise impact vegetation beyond the clearance footprint. CDFW also

L117-14

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L117-14 recommends any irrigation proposed in brush clearance drain back into Scholl Canyon Landfill and not downslope into natural habitat areas. This would avoid creating perennial sources of water that allow for the introduction of invasive Argentine ants.

Recommendation #2: Project Alternatives

L117-15 CDFW recommends the Project consider alternative designs to alleviate the need to grade native habitat. CDFW recommends the City of Glendale consider alternative areas or configurations for the placement of the two water tanks, engine generator enclosures, and engine coolers. Construction and grading activities should be relocated to already disturbed land and existing roads/trails. This could avoid or minimize potential impacts to native vegetation communities on the south-facing slopes that may support rare plants and special status wildlife species. Project alternatives should avoid or otherwise minimize direct and indirect impacts to sensitive biological resources. A project alternative should be considered even if an alternative would impede to some degree the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6).

Recommendation #3: Security Fencing

L117-16 Page 17 of the DEIR states, “for security, the entire Project site would be enclosed with an eight-foot-high security fence with automatic gates. Security and safety lighting systems would be provided. The Project site is located in a low-density hillside area that could support wildlife movement across the broader landscape, sustaining both transitory and permanent wildlife populations. Accordingly, CDFW recommends the City of Glendale consider permeable, wildlife friendly fencing. Wildlife impermeable fencing prevents or creates a barrier for the passage of wildlife from one side to the other. Chain link fences – a type of impermeable fencing - can create hazards and barriers for wildlife movement, seasonal migrations, and access to food and water. CDFW recommends reviewing A Landowner’s Guide to Wildlife Friendly Fences for additional information (Montana Fish, Wildlife and Parks 2012).

Night lighting can disrupt the circadian rhythms of many wildlife species. Therefore, CDFW also recommends using low level lighting. All non-essential lighting should be eliminated. The Project should avoid or limit the use of artificial light during the hours of dawn and dusk, as these windows of time are when many wildlife species are most active.

Recommendation #4: Landscaping

L117-17 Habitat loss and invasive plants are a leading cause of native biodiversity loss. Invasive plant species spread quickly and can displace native plants, prevent native plant growth, and create monocultures. CDFW recommends that any landscaping (separate from mitigation for impacts to native vegetation communities) performed after the Project use native plants. The City of Glendale should not plant, seed, or otherwise introduce invasive exotic plant species to landscaped areas that are adjacent and/or near native habitat areas. CDFW strongly recommends avoiding Fountain grass which can quickly spread and displace native plants. In southern California, Fountain grass is rapidly invading steep west and south facing hillsides in western Santa Monica Mountains (Cal-IPC 2004). Moreover, Fountain grass may increase fuel load and therefore the frequency, intensity, and spread of fire.

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CDFW recommends using native, locally appropriate plant species and drought tolerant, lawn grass alternatives to reduce water consumption. Information on alternatives for invasive, non-native, or landscaping plants may be found on the California Invasive Plant Council's, Don't Plant a Pest webpage (Cal-IPC 2020). The Audubon Society's Native Plants Database is a resource to identify native plants and trees that will attract and benefit birds. Birds may help to control and reduce insects, reducing the need for pesticides (National Audubon Society 2020). The California Native Plant Society's Gardening and Xerces Society's Pollinator-Friendly Native Plant Lists webpage has information on native plant species that invite insects and pollinators (CNPS 2020b; Xerces Society 2020). Pollinators are critical components of our environment and essential to our food security. Insects – and primarily bees – provide the indispensable service of pollination to more than 85% of flowering plants (Ollerton et al. 2011)

L117-17

Per CEQA Guidelines Section 21081.6(a)(1), CDFW has provided the City of Glendale with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A). A final MMRP shall reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.

Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the City of Glendale and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required for the underlying Project approval to be operative, vested, and final (Cal. Code Regs., tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

L117-18

Conclusion

We appreciate the opportunity to comment on the Project to assist the City of Glendale in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the City of Glendale has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines, § 15073(e)]. If you have any questions or comments regarding this letter, please contact Ruby Kwan-Davis, Senior Environmental Scientist, at Ruby.Kwan-Davis@wildlife.ca.gov

L117-19

Sincerely,

DocuSigned by:
Erinn Wilson-Olgin
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Environmental Program Manager I

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Susan Howell – San Diego – Susan.Howell@wildlife.ca.gov

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CEQA Program Coordinator – Sacramento – CEQACommentLetters@wildlife.ca.gov

State Clearinghouse - state.clearinghouse@opr.ca.gov

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CHARLTON H. BONHAM, Director

L117-A

Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into a future environmental document for the Project. A final MMRP shall reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.

Biological Resources (BIO)			
Mitigation Measure (MM)		**Timing**	**Responsible Party**
MM-BIO-1- Impacts to Rare Plants – additional plant surveys	Two additional season-appropriate, focused rare plant surveys shall be performed between April and June to sufficiently conclude presence/absence of species that have a Moderate or High potential to occur. Rare plant surveys shall: • Be performed by a qualified botanist familiar with southern California plants; • Place emphasis on searching for rare plants where the proposed gas pipeline, two water tanks, security fencing, and engine generator enclosures would disturb natural areas and within 100 feet from these areas. Emphasis shall also be placed on all potential staging areas, ingress/egress routes (vehicles, equipment, and workers) and within 100 feet from these areas; and, • Use CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Survey method and results shall be provided in the final environmental document as updates to the Biological Resources chapter of the environmental document and as an appendix in the form of a survey report. The survey report shall provide the information described under Mitigation Measure #1 on page 6.	Prior to Project construction and activities	City of Glendale

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MM-BIO-2- Impacts to Rare Plants – avoidance	If CRPR 1, 2, 3, or 4 and/or CESA- or ESA-listed plants are detected following two additional spring-time surveys, the City of Glendale shall coordinate with a qualified biologist or botanist to establish robust and enforceable protected areas or exclusion zones. An adequate protected area shall be established around rare plants and habitat. The perimeter of all protected areas shall be adequately demarcated with temporary fencing. Project construction and activities; equipment and material staging; vegetation clearing; equipment refueling; and worker entry shall not occur in the protected area. Fencing shall be installed in a manner that is not harmful to wildlife. Fences shall not have any slack that may cause wildlife entanglement. Prohibited fencing materials include, but are not limited to, spikes, glass, razor, or barbed wire. Signage shall be posted near the fencing to inform workers of the sensitivity of the protected areas. The City of Glendale shall ensure that all perimeter controls are in place prior to commencing any construction, including all equipment staging and import of material. The protection measures shall be in place at the end of each working day and for the duration of the Project and maintained for the duration of the Project.	Prior to/During Project construction and activities	City of Glendale
MM-BIO-3- Impacts to Rare Plants – worker training	A qualified biologist shall provide a rare plant sensitivity training consistent with the Project's Worker Environmental Awareness Program (WEAP). A qualified biologist shall serve as a construction monitor during those periods when project activities would occur near protect areas to ensure that no inadvertent impacts on rare plants would occur; activities remain within the Project footprint (i.e., outside the demarcated buffer); and flagging is being maintained.	During Project construction and activities	City of Glendale

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MM-BIO-4- Impacts to Rare Plants – mitigation plan	If CRPR 1, 2, 3, or 4 and/or CESA- or ESA-listed plants are detected, and the Project cannot feasibly avoid impacting those plants, regardless of the level of impact, City of Glendale shall notify CDFW. For impacts to CESA-listed, ESA-listed, CRPR 1, or CRPR 2 plant species, the City of Glendale shall prepare a species-specific mitigation plan. A mitigation plan shall be fully developed and executed prior to finalizing the environmental document and prior to any Project construction and activities. The City of Glendale shall develop a plan in consultation with CDFW. If take of CESA-listed species will occur, the City of Glendale shall also seek appropriate take authorization under CESA prior to implementing the Project.	Prior to Project construction and activities	City of Glendale
MM-BIO-5- Impacts to Aquatic and Riparian resources	The City of Glendale shall submit notification to CDFW pursuant to Fish and Game Code, section 1600 *et seq*.	Prior to Project construction and activities	City of Glendale
MM-BIO-6- Impacts to Aquatic and Riparian resources	Lake and Streambed Alteration Agreement notification shall include a hydrology report to evaluate both above and below ground sections of any pipeline that would cross streams and concrete lined channels. The hydrology report shall also include a scour analysis to demonstrate that stream banks would not erode.	Prior to Project construction and activities	City of Glendale
MM-BIO-7- Impacts to Vegetation Communities	The City of Glendale shall restore or create habitat on or off site at no less than 3:1 for permanent impacts to 3.21 acres of laurel sumac scrub and 0.22 acres of California sagebrush-California buckwheat scrub. For mitigation through participation in a mitigation bank, the City shall mitigate at no less than 2:1 for permanent impacts for both vegetation communities.	After Project construction and activities	City of Glendale

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MM-BIO-8-Impacts to Vegetation Communities	This Project would impact 3.37 acres of laurel sumac scrub (*Malosma laurina* Shrubland Alliance) and 0.22 acres of California sagebrush-California buckwheat scrub (*Artemisia californica-Eriogonum fasciculatum* Shrubland Alliance). The compensation for the loss of habitats shall be achieved by [list specific mitigation plan action (i.e., on or off-site mitigation or participation in a mitigation bank)]. Temporarily impacted communities shall be restored at a mitigation ratio of 1:1. Permanent impacts to impacted communities shall be 3:1 for on- or off-site habitat restoration or creation, or 2:1 for participation in an established mitigation bank program. Prior to any Project construction or activities, including equipment staging, mobilization, and grading, an ecosystem-based Habitat Mitigation and Monitoring Plan shall be prepared that will guide all restoration and monitoring activities. A Habitat Mitigation and Monitoring Plan shall be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. This plan shall include, at a minimum, the following: • Provide the total acreage of unique sensitive vegetation communities impacted, and abundance, density, and cover of each plant species and vegetation layer impacted (i.e., ground cover, forbs, subshrub, shrub, and tree). • Provide the specific location of on- and/or off-site mitigation area(s) and a science-based discussion as to why the mitigation area(s) is appropriate for mitigating Project-related impacts. Describe the area(s) environmental features (i.e., soils, slope, existing vegetation, hydrology) that would suggest the mitigation area(s) can support the vegetation and wildlife impacted by Project activities. • Provide a vegetation survey conducted at a reference site containing the vegetation communities being mitigated, with as good or better quality habitat, to document the density,	Prior to Project construction and activities	City of Glendale

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	abundance, diversity, and percent cover for each species by vegetation layer. • A schematic depicting the mitigation area. • Proposed species list for creation/enhancement. A plant palette shall consist of species that are diverse with respect to growing duration (annual, perennial), life form (grasses, shrubs, trees, vines), and structure (ground cover, shrubs, tree canopy) that form the vegetation alliance that is being mitigated. • Planting/seeding methodology (e.g., sources of local propagules, container sizes, and seeding rates). • Planting schedule • Irrigation plan • Weeding schedule and invasive plant control methods that reduces or eliminates the use of chemicals. • Success criteria • Monitoring methodology and schedule extended across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought. • Reporting requirements		
MM-BIO-9-Impacts to Vegetation Communities	Habitat restoration or creation shall occur in areas suitable to support plant species found in laurel sumac scrub and California sagebrush-California buckwheat scrub. Mitigation shall not occur on where physical and/or biological factors (e.g., soils, slope) are not suitable to support laurel sumac scrub and California sagebrush-California buckwheat scrub. Additionally, any on-site mitigation shall not occur in or immediately adjacent to areas of dense Fountain grass (*Pennisetum setaceum*) or non-native annual grasses (e.g., wild oat, *Avena barbata*).	Prior to/After Project construction and activities	City of Glendale

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MM-BIO-10-Impacts to Vegetation Communities	Prior to any Project construction and activities, the perimeter of the 3.37 acres of laurel sumac scrub and 0.22 acres of California sagebrush-California buckwheat scrub shall be clearly delineated by temporary stakes, flags, or other clearly identifiable system. Fencing shall be accompanied by signage. During WEAP, workers shall be advised not to cut, clear, pull, or trample vegetation; toss or pile debris and garbage; or otherwise impact vegetation beyond the demarcated area to protect native plants, habitat, and any special status plants and wildlife, and prevent additional impacts Temporary fencing and signage shall be maintained for the duration of the Project and removed after Project construction and activities are completed.	Prior to Project construction and activities	City of Glendale
MM-BIO-11-Impacts to Coast live oak trees and trees	Project construction and activities including (but not limited to) construction traffic, staging areas, debris piles, trenching, excavation, and soil compaction, shall not occur within a tree's drip line or a tree's Critical Root Zone (CRZ). Prior to any Project construction and activities that could impact trees, particularly coast live oak trees, the City of Glendale shall conduct a site visit with a certified arborist to identify trees that could be impacted. The City of Glendale, in consultation with a certified arborist, shall prepare a plan to protect the CRZ of trees that may be impacted. The City of Glendale/certified arborist shall also identify any trees that may need to be cut or limbed or require roots (i.e., tap root, main roots, and any surface-feeding roots) to be disturbed. At a minimum, the plan shall implement temporary fencing installed around the CRZ of any tree that may be impacted. Fencing shall be maintained for the duration of the Project and removed after all Project construction is completed. If roots or canopy of coast live oak trees must be cut or disturbed, actions shall be performed by a certified arborist or under the supervision of a certified arborist. If substantial impacts to roots and canopy of trees occur that will lead to decreased health of mortality of a tree, coast live oak trees shall be replaced at a	Prior to/After Project construction and activities	City of Glendale

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	minimum ratio of 4:1. Non-native, ornamental trees shall be replaced with native species at no less than 2:1. The City of Glendale shall develop a Mitigation, Monitoring, and Reporting plan in consultation with a certified arborist and/or qualified restoration professional, the City of Glendale's Arborist Technician under the City's Indigenous Tree Ordinance, and the California Department of Fish and Wildlife.		
MM-BIO-12- Impacts to Crotch bumble bee	Within one year prior to vegetation removal and/or grading, a qualified entomologist familiar with the species behavior and life history shall conduct surveys to determine the presence/absence of Crotch's bumble bee. Surveys shall be conducted during flying season when the species is most likely to be detected above ground, between March 1 to September 1. Survey results including negative findings shall be submitted to CDFW prior to initiation of Project activities. If "take" or adverse impacts to Crotch's bumble bee cannot be avoided either during Project activities or over the life of the Project, the City of Glendale must consult CDFW to determine if a CESA incidental take permit is required.	Prior to Project construction and activities	City of Glendale
MM-BIO-13- Impacts to California Coastal Gnatcatcher	A species-specific, protocol survey shall be performed to determine presence/absence of coastal California gnatcatcher prior to any project construction and activities, including equipment staging, mobilization, and grading. Surveys shall be performed in accordance to USFWS Coastal California Gnatcatcher Presence/Absence Survey Guidelines. The City of Glendale shall also prepare and provide a survey report including negative findings (i.e., absence/no detection) to the USFWS and CDFW for review within 45 days as described in the survey protocol.	Prior to Project construction and activities	City of Glendale

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MM-BIO-14- Impacts to California Coastal Gnatcatcher	If coastal California gnatcatcher is detected/present, the City of Glendale shall consult with CDFW to identify appropriate avoidance and mitigation measures. Avoidance and mitigation measures shall be fully developed prior to any project construction and activities.	Prior to Project construction and activities	City of Glendale
MM-BIO-15- Impacts to Species of Special Concern – Species surveys	The City of Glendale/qualified biologist must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities.	Prior to Project construction and activities	City of Glendale
MM-BIO-16- Impacts to Species of Special Concern – Species surveys	The City of Glendale shall retain a qualified biologist with experience surveying for southern California special status wildlife species. Prior to commencing any project construction and activities, including equipment and material staging, the qualified biologist shall conduct surveys for where suitable habitat is present and directly impacted by project construction and activities, and construction equipment and vehicle access and parking. Surveys shall place an emphasis towards identifying any Species of Special Concern (SSC) including (but not limited to) the southern California legless lizard; California glossy snake; coastal whiptail; coast horned lizard; and San Diego desert woodrat. Focused surveys shall consist of a minimum of three daytime surveys and one nighttime survey no more than 7 days from the start of any project construction and activities. If SSC are detected, the qualified biologist shall use visible flagging to mark the location where SSC was detected. The qualified biologist shall take a photo of each location, map each location, and provide the specific species detected at that location. Flagging shall be maintained for the duration of the project. The qualified biologist shall provide a summary report of herpetofauna surveys to the City of Glendale before any demolition, paving, soil compaction, and vegetation clearing work occurs.	Prior to Project construction and activities	City of Glendale

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MM-BIO-17- Impacts to Species of Special Concern – Relocation plan	The qualified biologist shall prepare a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas. The list (or plan) of protocols shall be implemented during project construction and activities/biological construction monitoring. The City of Glendale/qualified biologist may consult with CDFW to prepare species-specific protocols for proper handling and relocation procedures.	Prior to Project construction and activities	City of Glendale
MM-BIO-18- Impacts to Species of Special Concern – Worker Training and Field Protocols	During project construction and activities, the qualified biologist shall have prepared a map showing locations where SSC were detected and share this information to workers as part of the Worker Environmental Awareness Program (WEAP). The qualified biologist shall communicate to workers that upon encounter with a SSC, work must stop, a qualified biologist must be notified, and work may only resume once a qualified biologist has determined that it is safe to do so. Any contractor or employee that inadvertently kills or injures a special-status animal, or finds one either dead, injured, or entrapped, shall immediately report the incident to the qualified biologist and/or on-site representative identified in the WEAP. Monitoring by a qualified biologist will occur continuously during all ground disturbance work (i.e., demolition, paving, soil compaction, and grading), vegetation removal, and installation of the portion of the gas pipeline occurring in densely vegetated areas. Surveys for SSC shall be conducted prior to the initiation of each day of vegetation removal activities in suitable habitat. Surveys for SSC shall be conducted in the areas flagged in earlier surveys before construction and activities may occur in or adjacent to those areas. Work may only occur in these areas after a qualified biologist has determined it is safe to do so. Even so, workers shall be advised to work with caution near flagged areas. Once all ground disturbance work, vegetation removal, and pipeline installation are complete, monitoring will occur periodically for the duration of the project. If	During Project construction and activities	City of Glendale

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	SSC is encountered, qualified biologist shall safely relocate the animal per relocation and handling protocols.		
MM-BIO-19- Impacts to Species of Special Concern – injured or dead wildlife	If any SSC are harmed during relocation or a dead or injured animal is found, work in the immediate area shall stop immediately, the qualified biologist shall be notified, and dead or injured wildlife documented immediately. The qualified biologist shall contact the USFWS, CDFW, and the City of Glendale by telephone by the end of the day, or at the beginning of the next working day if the agency office is closed. In addition, a formal report shall be sent to the City of Glendale, CDFW, and USFWS (as appropriate) within three calendar days of the incident or finding. The report shall include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Injured animals shall be taken immediately to the nearest appropriate veterinary or wildlife rehabilitation facility. The qualified biologist shall, immediately upon finding the remains or injured animal, coordinate with the on-site construction foreman to discuss the events that caused the mortality or injury, if known, and implement measures to prevent future incidents. Details of these measures shall be included with the report. Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death. Species remains shall be collected and frozen as soon as possible, and CDFW and USFWS, as appropriate, shall be contacted regarding ultimate disposal of the remains.	During Project construction and activities	City of Glendale
MM-BIO-20- Impacts to Nesting Birds	Project construction, equipment staging, mobilization, grading, ground disturbance activities, and vegetation removal shall be completed outside the avian breeding season. The City of Glendale will not perform any Project construction or activities or remove or otherwise disturb vegetation on the project site from February 15 to August 31, and as early as January 1, to avoid impacts to breeding/nesting birds.	Prior to Project construction and activities	City of Glendale

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MM-BIO-21- Impacts to Bats - surveys	A qualified bat specialist shall conduct bat surveys within the Biological Study Area (plus a 100-foot buffer as access allows) in order to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. Acoustic recognition technology shall be used to maximize detection of bats.	Prior to Project construction and activities	City of Glendale
MM-BIO-22- Impacts to Bats – Tree removal	If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year and could roost in trees, trees shall be pushed down using heavy machinery rather than felling it with a chainsaw (if tree removal is necessary). To ensure the optimum warning for any roosting bats that may still be present, trees shall be pushed lightly two to three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree shall then be pushed to the ground slowly and remain in place until it is inspected by a bat specialist. Trees that are known to be bat roosts shall not be bucked or mulched immediately. A period of at least 24 hours, and preferably 48 hours, shall elapse prior to such operations to allow bats to escape.	During Project construction and activities	City of Glendale
MM-BIO-23- Impacts to Bats – Maternity roosts	If maternity roosts are found, to the extent feasible, work shall be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are not yet ready to fly out of the roost (March 1 to September 30).	Prior to/During Project construction and activities	City of Glendale
MM-BIO-24- Impacts to Bats – Maternity roosts	If maternity roosts are found and trees must be removed during the maternity season, a qualified bat specialist shall conduct a preconstruction survey to identify those trees proposed for disturbance that could provide hibernacula or nursery colony roosting habitat. Acoustic recognition technology shall be used to maximize detection of bats. Each tree identified as potentially supporting an active maternity roost shall be closely inspected by the bat specialist no more than 7 days prior to tree disturbance to determine the presence or absence of roosting bats more precisely. If maternity roosts are detected, trees determined to be	Prior to/During Project construction and activities	City of Glendale

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	maternity roosts shall be left in place until the end of the maternity season. Work shall not occur within 100 feet of or directly under or adjacent to an active roost and work shall not occur between 30 minutes before sunset and 30 minutes after sunrise.		

L118

From: Cynthia Kellman
To: Krause, Erik
Cc: Amy Minteer
Subject: Comments on Biogas Renewable Generation Project EIR; State Clearinghouse Number 2017081062
Date: Tuesday, September 29, 2020 12:47:03 PM
Attachments: GOCHA Comments on Biogas Project DEIR with attachments.pdf

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Krause,

L118-1 Attached please find a comment letter from Amy Minteer regarding the above-captioned subject.

Please feel free to contact me with any questions or concerns.

Cynthia Kellman
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September 28, 2020

Via Email (ekrause@glendaleca.gov)

Erik Krause
Deputy Director for Community Development
City of Glendale
Community Development Department
633 E. Broadway, Suite 103
Glendale, CA 91206-4311

Re: Comments on Biogas Renewable Generation Project EIR; State Clearinghouse Number 2017081062

Dear Mr. Krause,

L118-2 On behalf of the Glenoaks Canyon Homeowners Association, we provide these comments on the draft environmental impact report (DEIR) for the Biogas Renewable Generation Project ("Project" or "Biogas Project"). The Glenoaks Canyon Homeowners Association (GOCHA), a non-profit mutual benefit corporation (503C4), is an alliance of volunteer canyon homeowners and residents. GOCHA's mission is to preserve, protect and enhance the beautiful Glenoaks Canyon, while fostering a strong sense of community. The Association achieves this mission by (1) monitoring proposed new development, (2) evaluating the City's ongoing plans with the Scholl Canyon Landfill, (3) working closely with Neighborhood Watch, (4) preparing disaster preparedness plans, and (5) organizing various community events.

L118-3 The Biogas Project would be developed on the Scholl Canyon Landfill (SCLF) site and would rely on landfill gas (LFG) to generate power. The DEIR for this Project falls far short of the information disclosure requirements set forth by the California Environmental Quality Act (CEQA). The DEIR fails to include an accurate and complete project description, failing to adequately address the closure of the SCLF, including whether the Project could induce expansion of the SCLF, or to disclose the continued use of flares under the Project. Despite repeated requests from GOCHA and other agencies, including the City of Los Angeles, the DEIR fails to consider the whole of the project.

L118-3

Instead it improperly segments review of the Biogas Project from the linked Grayson Repowering Project. The DEIR's analysis of air quality impacts is also inadequate. For many years, the LFG produced by the SCLF was processed at the Grayson Power Plant, but instead of using this longstanding method of LFG disposal as the baseline condition, the DEIR improperly relies upon the very recent, and legally non-compliant, condition of flaring all LFG at SCLF. This improper baseline is set too high, and used to allow the Biogas Project to disregard substantial amounts of air emissions it would produce. This puts the burden of living with these high levels of air pollutants on the surrounding community instead of implementing mitigation to reduce the emissions. The DEIR also attempts to rely on uncertain Priority Reserve credits to further reduce the obligation to mitigate air quality impacts for the surrounding community. Further ignoring impacts to this community, the DEIR fails to address toxic dioxin emissions. The DEIR further gives short shrift to the serious and foreseeable wildfire impacts at and around the Project site. Finally, the DEIR's alternatives analysis fails to include a reasonable range of alternatives or the necessary comparative analysis of the alternatives that are included.

I. The DEIR Fails to Adequately and Accurately Define the Whole of the Project.

A. The DEIR Contains an Inadequate Project Description.

L118-4

"[A]n accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR." (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199.) The EIR must provide an adequate description of the whole of the action that is being contemplated. (CEQA Guidelines, § 15378, subd. (c).) Contrary to these requirements, the project description provided for the Biogas Project fails to provide adequate information to allow an assessment of all Project impacts, including the reasonably foreseeable consequences of the Project, and also prevents an accurate comparison of the Project to alternatives.

The DEIR for the Biogas Project fails to provide adequate information regarding the closure of the Scholl Canyon Landfill (SCLF) to allow for an adequate assessment of the Project's impacts. An expansion of the SCLF was previously analyzed by the City. Although the City claims it does not plan to move forward with the expansion project at this time, there is nothing preventing the City from restarting the SCLF expansion project process, particularly given that a substantial amount of work has already been completed for this project, including preparation of an EIR. According to this draft EIR for the

SCLF expansion project, the SCLF would reach capacity at the end of 2021. The Biogas Project EIR provides contradictory information, claiming the SCLF would not reach capacity until 2030. The Biogas Project relies upon LFG produced by the SCLF, thus the EIR must provide detailed and supported information regarding when the landfill would reach capacity.

This lack of information is compounded by the DEIR's failure to assess how long the SCLF would continue to produce LFG once it has been closed due to reaching capacity. The DEIR states the life of the Project is as long as LFG can be used, but does not provide an estimate for how long that would be. This information is necessary to assess Project impacts. For example, the DEIR states the equipment could be used for 20 years, but if the SCLF would not produce LFG for 20 years based on its current capacity, would the Biogas Project spur an expansion of capacity at the SCLF to allow the City redeem the full use of substantial investment in constructing a Biogas Plant? Also, this information is necessary to compare the Project's impacts and economic feasibility to that of the alternatives.

L118-4

Additionally, the EIR and project description fail to describe the landfill's future after it has reached capacity. The Joint Powers Agreement for Scholl Canyon identifies an intent for the SCLF to become a recreational area after closure. The EIR must identify this future use so that it can adequately address the aesthetic and recreational impacts of the Project constructing an industrial use next to a recreational area.

The DEIR also fails to disclose that it is highly likely the flares for LFG would need to operate simultaneously with the Biogas Plant. Documentation from the Los Angeles County Sanitation District, obtained by GOCHA pursuant to a Public Records Act request, shows current LFG flow from the SCLF is approximately 6,000 standard cubic feet per minute (scfm), which is greater than the Biogas Plant's capacity of approximately 5,000 scfm. (Attachment 1, SCLF gas flow rates.) Thus, while the Biogas Plant is operating at full capacity, it would still require up to 1,000 scfm of LFG to be disposed of through the existing outdated and polluting flare system. The EIR fails to disclose this need for both to be in operation when discussing operation of the Biogas Project. As discussed below, this provides inadequate disclosure of Project air quality impacts and an inaccurate comparison of the Project to alternatives.

L118-5

B. The DEIE Improperly Segments Review of the Biogas Plant from the Grayson Plant Repowering.

GOCHA previously provided comments on the improper segmentation of the Grayson Repowering Project from this fundamentally Biogas Project. (Attachment 2, comments on Grayson Repowering Project; Attachment 3, comments on Biogas MND.) Both the Biogas Project, addressing landfill gas, and the repowering of Grayson Power Plant impact space at Grayson, Glendale's electricity needs and Glendale's renewable portfolio. These projects are part of the whole of an action by the City and as such should be analyzed in joint EIR to address how the projects can fit together, how Glendale's power needs can be met, the overall costs and how to meet Glendale's renewable portfolio targets.

L118-5

Despite receiving repeated requests from GOCHA and other community members to do so, the Biogas EIR fails to consider the whole of the project, relying on an improperly "narrow view of the relevant project." (*California Unions for Reliable Energy v. Mojave Desert Air Quality Management Dist.* (2009) 178 Cal.App.4th 1225, 1241-1242.) "[T]he interrelated character of the proposals was known in advance. [Thus] the selection of a narrow project as the launching pad for a vastly wider proposal frustrated CEQA's public information aims." (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199–200.)

CEQA requires that environmental review documents analyze "the whole of an action" (CEQA Guidelines § 15378) and not evade comprehensive CEQA analysis by splitting projects into separate pieces for purposes of environmental review. "One way to evaluate which acts are part of a project is to examine how closely related the acts are to the overall objective of the project." (*Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1226.) Here, the Biogas Project and the Grayson Repowering Project have the identical objective of providing local power generation, and the Biogas Project would generate that power through the use of gas produced at the Scholl Canyon Landfill, gas which was used for power generation at the Grayson Power Plant until very recently. The EIR for the Grayson Repowering Project acknowledges the interconnected nature of these projects. (Attachment 5, Grayson Repowering Project EIR pp. 3.1, 3.11.)

The relationship in time, physical location and entity undertaking the actions is also a clear indicator that these two projects are part of the whole of a single project that should be analyzed jointly in an EIR. Both projects are currently under consideration by the City. The SCLF and the Grayson Power Plant are currently linked by pipeline that

for years carried the LFG now proposed to be used by the Biogas Project. Further, the City is the project proponent and entity undertaking both projects. The City cannot evade
L118-5 full CEQA review of the projects by segmenting review of the Grayson Repowering Project from review of the Biogas Project. The failure to analyze these projects in one EIR has resulted in a failure to address potential impacts and an accurate comparison of alternatives. The City is currently revising the EIR for the Grayson Repowering Project, which provides a timely and cost-efficient opportunity for the City analyze the whole of the City's action in one joint EIR, as it should have done from the start.

C. The EIR Fails to Address Reasonably Foreseeable Growth Inducing Impacts.

CEQA Guidelines section 15126.2, subdivision (e) requires an EIR to address any growth inducing impacts associated with a project. Here, the EIR fails to address growth inducing impacts associated with the Biogas Project. Implementation of this Project, which relies upon LFG produced by the Scholl Canyon Landfill, would indirectly encourage expansion of the SCLF. The City will be investing millions of dollars in infrastructure to generate power from the LFG and will want to continue that source of
L118-6 fuel for its investment. The EIR fails to include a detailed analysis of the amount of LFG that would be produced by the SCLF based on its current capacity limits. Previous documentation has stated this capacity would be reached by 2021, although without support the EIR for the Biogas Project now claims the SCLF would continue operating through at least 2030. (Attachment 4, excerpt of Scholl Canyon Landfill Expansion Project EIR.) The EIR must also assess in detail how long the SCLF would continue producing LFG based on its current capacity limit. Failure to include this information does not allow for the necessary assessment of whether the Project could induce expansion of capacity at the SCLF. This assessment is particularly necessary given the City has previously proposed an expansion of SCLF. While that project is not currently moving forward, an EIR has been prepared making it reasonably foreseeable.

II. The DEIR's Analysis of Impacts is Inadequate and Inaccurate.

L118-7

A. Air Quality Issues Are Not Adequately Addressed.

1. The City Has Improperly Manipulated Baseline Conditions.

Without an accurate baseline, an EIR cannot accurately disclose a project's likely environmental impacts, or determine whether those impacts can be fully mitigated. (*Communities for a Better Environment v. South Coast Air Quality Management District* (2010) 48 Cal.4th 310, 322.) Under CEQA, a project's environmental impacts are determined by comparing the environmental baseline, the without-project conditions, to with-project conditions. (CEQA Guidelines §15125, subd. (a).) An artificially high baseline fails to address all project impacts by relegating what are actually "new" impacts to existing conditions. This prevents an EIR from formulating mitigation measures capturing the project's full impacts. Thus, an accurate baseline is fundamental to an accurate CEQA analysis. (*Citizens for East Shore Parks v. California State Lands Com.* (2011) 202 Cal.App.4th 549, 557.)

Here, the City relies on the short window of time where the LFG flares are operating out of compliance with existing South Coast Air Quality Management District (SCAQMD) standards and above established thresholds of significance. (See DEIR p. 4.63.[1]) This fails to provide the full picture of facts and CEQA's baseline requirements. The purpose of CEQA review is to provide enough information to disclose to the public and decision makers potential impacts associated with a project. (*King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 869.) This fails to acknowledge that the prior to April 2018, the SCLF LFG had been transported to the Grayson Power for processing for many years. CEQA provides for the use of historic conditions as the baseline "where necessary to provide the most accurate picture practically possible of the project's impacts." (CEQA Guidelines § 15125, subd. (a)(1).) When operating conditions have changed shortly before the issuance of the NOP, reliance on historic conditions as the baseline is proper. (CEQA *Cherry Valley Pass Acres & Neighbors v. City of Beaumont* (2010) 190 Cal.App.4th 316, 337–338; *North County Advocates v. City of Carlsbad* (2015) 241 Cal.App.4th 94, 104–106; *Association of Irritated Residents v. Kern County Bd. of Supervisors* (2017) 17 Cal.App.5th 708, 728–729.)

L118-7

When the Biogas Project was first proposed and an MND was prepared, the LFG was still being transported to the Grayson Power Plant and not flared at the SCLF. Similarly, when the Grayson Repowering Project EIR was circulated in March 2018, LFG was "currently being combusted in Grayson's Units 3, 4, and 5 boilers."

[1] NOx emissions from flares are 90 lbs/day, threshold is 55 lbs/day. PM2.5 emissions from flares are 62 lbs/day, threshold is 55 lbs/day.

(Attachment 5, Grayson Repowering Project DEIR Project Description.) The City states SCLF stopped sending LFG to the Grayson Power Plant in April 2018. (DEIR p. 2.1.)

Relying on the short term and highly impactful operation of flares to burn all LFG from the SCLF is an improper baseline that fails to adequately address the Biogas Plant's significant impacts on the community surrounding the SCLF. The long history of processing LFG at Grayson should be used as the baseline because it provides a more accurate disclosure of the air quality impacts associated with the Biogas Plant. The City's manipulation of the baseline by commencing flaring at SCLF simultaneously to releasing a NOP for the Biogas Project EIR, a project for which an MND had already been prepared, sets an artificially high baseline. Moreover, the flares at SCLF are out of compliance with SCAQMD rules and would be required to be replaced with flares that produce far less emissions in the near term if the Biogas Project does not go forward. Thus, the use of outlawed flares that are currently causing significant levels of pollutant in the neighborhood surrounding the SCLF should not be relied upon as the baseline conditions. To do so fails to disclose to the public and decision makers the true impacts associated with the Biogas Plant.

L118-7

2. The DEIR Fails to Address Cumulative Impacts of Project Operation and Flaring.

The EIR fails to analyze the potential impacts associated with operating both the flare equipment and the Biogas Plant at the same time. As discussed above, documentation shows current LFG production from the SCLF is approximately 6,000 scfm, greater than the Biogas Plant's capacity of 5,000 scfm. Thus, while the Biogas Plant is operating at full capacity, it would still require 1,000 scfm of LFG to be disposed of through the existing outdated and polluting flare system. The EIR fails to disclose the air emissions that would be produced when the flare is operated at the same time as the Biogas Plant. This would significantly increase the release of harmful air pollutants. As discussed above, the Project is already producing pollutants in excess of health-based air quality standards. The operation of both pollution sources at the same time would increase those impacts.

L118-8

3. The EIR Cannot Rely on Priority Reserve Credits to Claim Impacts Are Less Than Significant

L118-9

CEQA Guidelines section 15126.4, subdivision (a)(2) requires that all mitigation measures be "fully enforceable." Here, the EIR relies on the use of SCAQMD Priority Reserve credits to mitigate the significant NOx and VOC emissions from the Biogas Project. However, the City cannot approve Priority Reserve credits for the Project; only the SCAQMD can do so. The City assumes the SCAQMD will approve these credits needed to claim the Project's air quality impacts have been mitigated to a less than significant level, but it cannot guarantee all credits will be approved.

That the City will seek these credits is not a fully enforceable mitigation measure. As such, CEQA requires the City to conclude the Biogas Project will have remaining significant and unavoidable air quality impacts and to make one of the following findings pursuant to Public Resources Code § 21081:

L118-9

> (1) Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
> (2) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
> (3) Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

The City cannot simply assume a significant portion of the allocated Priority Reserve credits will be applied to the Project as they have done in the EIR.

The only way the Biogas Project could qualify for Priority Reserve credits is as an "essential public service"; it is too large to qualify as an electrical generating facility because it generates more than 10 megawatts. (DEIR p. 2.5 [the Project would generate 12 megawatts].) The EIR has also failed to demonstrate the Project has included best available control technology to reduce emissions prior to seeking credits.

4. The EIR Fails to Disclose Impacts from Toxic Air Contaminant Dioxin.

L118-10

CEQA is, at its core, an informational statute that requires agencies to disclose a proposed project's impacts prior to project approval. (CEQA Guidelines § 15002, subd. (a)(1).) As discussed in detail in the expert report prepared by SWAPE, the DEIR fails to

adequately analyze and mitigate the health impacts associated with the Project's dioxin
L118-10 emissions. The EIR's air quality assessment is informationally deficient under CEQA because it fails to disclose the Project's dioxin emissions or their impact on human health. (See *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 518.)

B. The DEIR Relies on Improper Baseline for Greenhouse Gas Emissions.

As with air emissions, the DEIR relies on an improperly elevated baseline when
L118-11 assessing the Project's greenhouse gas (GHG) emission impacts. The Biogas Project would produce GHGs nearly *five times* the SCAQMD's significance threshold of 10,000 metric tons per year. Instead of acknowledging this significant adverse impact and imposing mitigation measures, the DEIR relies on an inflated baseline level of GHG production from the short-term flares that are producing emissions in excess of SCAQMD limits. The long history of processing LFG at Grayson should be used as the baseline instead because it provides a more accurate disclosure of the GHG impacts associated with the Biogas Plant. (See Section II.A.1.)

C. The EIR Does Not Adequately Analyze the Proposed Project's Wildfire Risk.

Wildfire presents a huge risk to Glenoaks and Chevy Chase Canyons, Linda Vista and Eagle Rock due to its location in a designated VHFHSZ. These neighborhoods are all limited by narrow, single access roads, and any increase in wildfire risk puts them in grave danger. Yet the DEIR's wildfire analysis minimizes this danger by not adequately analyzing and disclosing the Project's wildfire impacts, nor its potential mitigation measures.

L118-12 Wildfires present an eminent threat to California. This year alone, fires have already claimed 25 lives, burned an estimated 3.6 million acres, and destroyed over 7,000 structures. (CalFire, https://www.fire.ca.gov/incidents/2020/, accessed on September 22, 2020.) Besides the immediate damage and loss of life, these fires lead to smoke-filled skies and horrible air quality throughout the state, which has serious health impacts. ("Wildfire Smoke: A Guide for Public Health Officials," available at https://www.airnow.gov/sites/default/files/2020-05/wildfire-smoke-guide-revised-2019-chapters-1-3.pdf.) Further, wildfires in California alone this year have already emitted an estimated 79.6 million metric tons of carbon dioxide, exacerbating climate impacts.

(Laura Millan Lombrana and Akshat Rathi, "California Fires Are Emitting Record Amounts of Carbon Dioxide," Bloomberg News (Sep. 16, 2020), available at https://www.bloomberg.com/news/articles/2020-09-16/california-fires-are-emitting-record-amounts-of-carbon-dioxide.)

The Project is located in a Very High Fire Hazard Severity Zone ("VHFHSZ"), which Cal Fire designates as the most at risk for fire within the State. (DEIR, p. 4.266.) Furthermore, the Scholl Canyon Landfill is roughly six miles from the edge of the Angeles National Forest, where the Bobcat Fire is currently blazing and has burned over 100,000 acres, making it one of the largest fires in Los Angeles County history. (Ruben Vives and Alex Wigglesworth, "Bobcat Fire Grows to 103,000 Acres, Making It One of L.A. County's Largest Blazes Ever," LA Times (Sep. 20, 2020), available at https://www.latimes.com/california/story/2020-09-20/bobcat-fire-update-100-000-acres-la-county.) Under CEQA, agencies must regulate activities like the Project "so that major consideration is given to preventing environmental damage." (Pub. Resources Code § 21000, subd. (g); *Laurel Heights Improvement Assn. v. Regents of the University of California* (1988) 47 Cal.3d 376, 390.) Thus, it is imperative that the City of Glendale perform an analysis that meets the requirements of CEQA. L118-12

1. The EIR Does Not Adequately Analyze and Disclose the Project's Impacts.

The Project DEIR states that the potential impact radius of an explosion originating from the proposed natural gas pipeline is approximately 9.26 feet. (DEIR, p. 4.296.) The DEIR also states that "[c]onsidering that there are no residences or other habitable structures within the potential impact radius, the vegetation maintenance setback required by GFD, and the pipeline is not publicly accessible, a pipeline explosion would have an extremely low risk of resulting in a wildfire." (DEIR, p. 4.296.) But this is a conclusory statement and does not reflect a good faith effort at full disclosure as required by CEQA. (*Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 935; *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 979–80.) The DEIR needs to demonstrate how these listed factors lead to the City's conclusion that an explosion in a VHFHSZ would have an "extremely low risk" of starting a wildfire. Further, the potential impact radius is less than 10 feet. With such a short impact radius, it is obvious that structures would not exist within this radius. The potential impact radius is only the measure of where "death, injury, or significant property damage" directly resulting from the explosion could occur. L118-13

(DEIR, p. 4.296; 49 C.F.R. § 192.903.) It does *not* describe the radius of where fires could start. Thus, the DEIR cannot rely on the potential impact radius to say that a pipeline explosion would not cause a wildfire.

Further, the DEIR's analysis does not adequately address the Project's potential exacerbation of wildfire impacts, which is required analysis as the Project is located in a VHFHSZ. "[D]irecting an agency to evaluate how . . . worsened conditions [resulting from a project] could affect a project's future users or residents" is part of CEQA's mandate to review a project's impacts on the environment. (*California Building Industry Assn. v. Bay Area Air Quality Management Dist.* (2015) 62 Cal.4th 369, 389.) Yet the objective of the Fire Protection Design Basis Plan is solely to "minimize the potential of a fire occurring at the Biogas Renewable Generation plant during demolition, construction and operation." (Appendix M, Fire Protection Design Basis Plan, p. 2.) Given that the Project is located in a VHFHSZ, the existing conditions at the Project site are *already* potentially hazardous with respect to wildfire impacts. By "bringing development and people into the area affected," the Project will exacerbate these impacts. (CEQA Guidelines, § 15126.2, subd. (a); *California Building Industry Assn., supra,* 62 Cal.4th at 388.) The DEIR thus must analyze the exacerbation of such impacts. Instead, the DEIR contains almost no analysis of *how* operation of the Project, which involves ***combustion of landfill gas in a Very High Fire Hazard Severity Zone*** does not exacerbate wildfire risks. (DEIR, p. 4.296–97.) The DEIR should describe how placing the engines in fire protection enclosures would reduce wildfire risk.

L118-13

The DEIR needs analysis regarding the Project's impacts to fire evacuation routes. The proposed project would add to fire evacuation problems, since the proposed exit down Scholl Canyon Rd. feeds into already overburdened Glenoaks Boulevard, which is a one-lane road that serves as the only exit. In addition to accommodating the personnel and vehicles from the Project, the road would already have to handle outgoing emergency traffic from 750 single-family homes (approximately 1700 residents, estimated that there are 1070 cars), two public parks (Lower Scholl Park with 43 marked parking spaces and Glenoaks Park with about 45 parking spaces around its 1-block perimeter), a major recreational facility with 8 tennis courts, a 18-hole golf course and driving range (102 marked parking spaces) and a baseball field (62 marked parking spaces and additional parking on the street). Glenoaks has cars parked on both sides of the street, which would make access to fire-fighting equipment almost impossible, especially while panicked residents are trying to flee for their lives. Additionally, parents of Glenoaks Elementary

L118-14

School students that live in the Chevy Chase Canyon would also pickup their children from school during a wildfire event, relying on and further clogging Glenoaks Boulevard.

L118-14

The DEIR states that access roads will be designed to accommodate emergency response vehicles, but does not indicate or explain where or how these roads will be built and/or maintained. (DEIR, p. 4.214.) The DEIR must indicate what access roads are suitable to accommodate emergency response vehicles on or near the site, and to what extent will such roads be cleared of surrounding brush on a regular basis.

L118-15

The DEIR fails to analyze the effects of an earthquake on the fault line under the canyon or its enhanced effects on fire danger or hazardous material dispersion. The consequence of an earthquake damaging the internal combustion engine ("ICE") protection enclosures cannot be discounted. Also, existing power lines running across the land fill pose an additional danger for possible ignition of brush in high winds or in case of earthquake or fire. The Project also proposes two oil storage tanks onsite, which would contain thousands of gallons of flammable liquid that could significantly exacerbate and fuel a fire in the area. The DEIR must include an analysis of these issues.

L118-16

The DEIR fails to adequately address various hazardous materials stored on site that could leak into the landfill as a result of an earthquake and/or fire. This landfill has no liner as required in present-day landfills and must be treated accordingly with great caution. The DEIR argues that "[c]ompliance with existing rules and regulations would serve to ensure that wildfire related impacts during operation" related to hazardous materials would be less than significant. But such conclusory statements are not sufficient to meet the informational requirements of CEQA. (See *Californians for Alternatives to Toxics v. Dept. of Food and Agriculture* (2005) 136 Cal.App.4th 1, 17.)

L118-17

The DEIR states, in only two sentences, that the Project will not have any cumulative wildfire impacts. (DEIR, p. 4.300.) CEQA requires analysis of cumulative impacts, which include "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." (CEQA Guidelines § 15355.) These include "[t]he individual . . . changes resulting from a single project or a number of separate projects," as well as cumulatively considerable effects, i.e., "incremental effects of an individual project . . . when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." (Pub. Resources Code § 21083, subd. (b)(2); CEQA Guidelines § 15355.) It is inconceivable that the Project, a power generation facility that will combust

landfill gas located in a VHFHSZ, will not have potential incremental effects in increasing wildfire risk in the region when compared with other projects in the area. At the very least, the DEIR should have provided more robust and non-conclusory analysis of the Project's cumulative impacts. That the Project is located five miles from the Grayson plant does not provide the public and decisionmakers with the information necessary to understanding the Project's cumulative impacts. (*Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1214; *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 515 ("*Friant Ranch*".)

L118-17

2. The EIR Does Not Adequately Analyze the Project's Mitigation Measures.

L118-18

First, the County urgently needs to analyze and disclose what mitigation is needed now when the landfill gas is being flared 100% of the time. There was no EIR done before the full-time flaring of LFG began. According to the DEIR, the Project "would be operated adjacent to the existing LFG collection and flaring system." (DEIR, p. 4.296.) The DEIR must evaluate the impacts and potential mitigation measures of this system.

As the DEIR has concluded, based on inadequate analysis, that operation of the Project will have no significant wildfire impacts, the DEIR fails to include any mitigation measures that address operation of the Project. The City should thoroughly analyze potential operational impacts and propose mitigation measures to address these impacts. For example, the City could extend each of its Mitigation Measures (FIRE-1 through FIRE-3) to cover the operational phase of the Project as well.

Mitigation Measure FIRE-2 only prohibits smoking and open fires at the site during construction, yet the life of the Project is estimated to be 20 years. (DEIR, pp. 4.295, 2.17.) The threat of ignition will not abate after construction. This measure should thus also prohibit smoking and open fires during the operation of the Project. Further, mitigation measures are required to be fully enforceable. (CEQA Guidelines § 15126.4(a)(2); *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 859.) The DEIR provides no indication how this measure will be enforced by the City or the Project operator.

L118-19

Mitigation Measure FIRE-3 includes construction of water tanks as a firefighting water supply during the construction phase only. However, these tanks would be susceptible to rupture in an earthquake. For this reason, a drainage chart is needed to

L118-19 assure no homes would be impacted in Glenoaks Canyon or other neighborhoods. Further, this mitigation measure should ensure there is adequate firefighting water supply during operation of the Project as well.

3. The EIR Must Accurately Disclose the Baseline Environmental Setting.

The EIR must include an accurate description of baseline conditions. (CEQA Guidelines § 15125, subd. (a).) The EIR should state that the steep and uneven terrain of the Project area makes fire suppression from the ground unrealistic.

L118-20

Further, the DEIR merely discloses that winds in the Project area in excess of 40 mph are common and gusts exceeding 100 mph are possible. (DEIR, p. 4.282.) EIRs should not only disclose such conditions, but also make a "reasonable effort to discuss relevant specifics regarding the connection between two segments of information already contained in the EIR." (Cf. *Friant Ranch, supra*, 6 Cal.5th 502, 519–20, 521.) Such wind velocity must be considered in view of fire spread and suppression and the downhill spread of airborne hazardous materials.

III. The DEIR's Alternatives Analysis is Inadequate.

The City has a duty under CEQA to evaluate a reasonable range of alternatives to the environmentally damaging proposed Project. (*Laurel Heights I, supra*, 47 Cal.3d at 400.) As the California Supreme Court has stated:

> Under CEQA, the public agency bears the burden of affirmatively demonstrating that . . . the agency's approval of the proposed project followed meaningful consideration of alternatives and mitigation measures.

L118-21

(*Mountain Lion Foundation v. Fish and Game Commission* (1997) 16 Cal.4th 105, 134, emphasis added; accord *Village Laguna of Laguna Beach v. Board of Supervisors* (1982) 134 Cal.App.3d 1022, 1035.) As the Court has said, while an EIR is "the heart of CEQA", the "core of an EIR is the mitigation and alternatives sections." (*Citizens of Goleta Valley v. Bd. Of Supervisors* (1990) 52 Cal.3d 553, 564.) Preparation of an adequate EIR with analysis of a reasonable range of alternatives is crucial to CEQA's

substantive mandate to "prevent significant avoidable damage to the environment" when alternatives or mitigation measures are feasible. (CEQA Guidelines § 15002(a)(3).)

L118-21

In fact, this DEIR was required specifically to assess alternatives to the proposed Project. Unfortunately, the DEIR fails to provides adequate and accurate information, preventing decision makers from determining the best course for achieving the objective of safely using LFG generated by the SCLF for beneficial purposes.

A. DEIR Must Be Revised and Recirculated to Disclose Significant Impacts and Alternatives that Address Those Impacts.

Initially, the analysis contained within the DEIR must be revised pursuant to the comments set forth above to allow for an accurate comparison of the proposed Project and potential alternatives. Once impacts are correctly assessed as significant, the discussion of alternatives must "focus on alternatives to the Project or its location which are capable of avoiding or substantially lessening any significant effects of the Project, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly." (CEQA Guidelines § 15126.6(b).)

L118-22

CEQA prohibits approval of a project with significant adverse environmental impacts when there are feasible alternatives or mitigation measures that would "avoid or substantially lessen" the project's significant effects. (Pub. Resources Code § 21002; *City of Marina v. Board of Trustees of California State University* (2006) 39 Cal.4th 341, 350.) An alternative need only avoid or substantially lessen any one of a project's significant impacts to be considered environmentally superior. (CEQA Guidelines § 15021, subd. (a)(2).) The finding that "[t]here is no feasible way to lessen or avoid the significant effect..." of a project must be supported by substantial evidence. (CEQA Guidelines §§ 15043, 15093, subd. (b).) An alternative must be "truly infeasible" for its rejection to be legally valid under CEQA. (*City of Marina, supra,* 39 Cal.4th 341, 369.) CEQA defines feasible as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors." (Pub. Resources Code § 21061.1.)

As discussed above in Section II.A.4, and in the expert report prepared by SWAPE, the Biogas Project would result in significant emission of dioxins, resulting in adverse public health impacts. Thus, an alternative that addresses this impact must be considered. SWAPE has proposed a modified version of Alternative 2 to address this

impact, one that includes the use of scrubbers to reduce emissions of VOCs and toxic by-products such as dioxin. Reasonable alternatives should only be eliminated from consideration in the EIR if the alternative would not meet most of the basic project objectives, is infeasible, or would not reduce significant environmental impacts. (CEQA Guidelines § 15126.6(c); *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1457.) A modified Alternative 2 with scrubbers would meet the project objective by safely capturing LFG and putting it to beneficial use, while also substantially lessening the air quality impacts that would result from the Project's dioxin and other VOC emissions.

L118-22

B. The DEIR Fails to Include the Necessary Comparative Analysis of Alternatives.

The DEIR also fails to provide sufficient information regarding Project alternatives to allow for the necessary comparison. Omission of comparative, quantitative analysis of alternative does not "produce information sufficient to permit a reasonable choice of alternatives so far as environmental aspects are concerned." (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 733-736.)

L118-23

The majority of the DEIR alternatives section is spent listing how other landfills in California dispose of LFG. (DEIR pp.5.5-5.16[2].) This list fails to provide information regarding the area surrounding each landfill, the estimated closure dates of each landfill, the expense of each landfill's LFG disposal, and, most importantly, the impacts of other LFG disposal systems. Without this information, the list does nothing more than fill pages that could otherwise be spent providing the missing detailed assessment of alternatives to this Project.

CEQA Guidelines section 15126.6, subdivision (d) requires the EIR to disclose the significance of impacts under alternatives. Instead of complying with this requirement, the DEIR includes a limited comparison of impacts under the Project and alternatives, identifying only whether the impacts would be more, less or the same. This does not provide the necessary quantitative analysis, particularly for air quality and greenhouse gas emissions. The DEIR fails to determine whether any alternatives would have *significant* in addition to those caused by the Project, as required by the CEQA Guidelines. Without the quantitative analysis and assessment of impact significance, the DEIR lacks adequate information to support rejection of Project alternatives.

[2] The alternatives section page numbering must be revised. The pages are numbered 5.0 to 5.16 and then confusingly start over again with a new 5.0 at page 17 of the section.

C. The DEIR's Assessment of Alternative 2 Is Inadequate.

The DEIR lacks adequate information to reject Alternative 2. As discussed above, the DEIR lacks the necessary quantitative comparative analysis of impacts associated with the Project and Alternative 2. The DEIR claims some impacts would be greater under Alternative 2, but lacks any evidentiary support for that claim. Additionally, the DEIR acknowledges wildfire, air quality, and greenhouse gas emissions impacts would all be reduced under Alternative 2, but fails to include sufficient information to allow decision makers to assess the magnitude of impact reduction. As discussed above, these impacts should have been, but were not, disclosed to be significant adverse impacts for the Project. Alternative 2 would achieve the project's fundamental objective. Thus, if Alternative 2 would substantially lessen any of these significant impacts, the City cannot reject this feasible alternative.

L118-24

The DEIR indicates Alternative 2 would be more expensive than the proposed Project, but fails to provide the necessary evidentiary support regarding short- and long-term costs associated with both to support a finding that Alternative 2 is economically infeasible. Comparative economic analysis is required to claim economic infeasibility of an alternative. (*Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587, 599.) The "fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible. What is required is evidence that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project." (*Citizens of Goleta Valley v. Board of Supervisors* (1988) 197 Cal.App.3d 1167, 1181; see also *Center for Biological Diversity v. County of San Bernardino* (2010) 185 Cal.App.4th 866, 883.) No such showing has been made; thus, any claim of economic infeasibility is unsupported. (*Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1462.)

D. The DEIR's Assessment of Alternative 4 Is Inadequate.

Alternative 4 is clearly a feasible alternative as this is how LFG from SCLF was treated up until very recently. As with Alternative 2, the DEIR lacks the necessary quantitative analysis of impacts associated with this alternative to provide sufficient information to the public and decision makers.

L118-25

The DEIR also claims Alternative 4 would result in a $20 to 25 million cost increase, but lacks the comparative analysis of all costs associated with this alternative and the Project to make such a determination. This claim also demonstrates why a joint EIR for the Biogas Project and the Grayson Repowering Project should be required. The DEIR fails to analyze whether the co-location of these facilities could result in economic efficiencies and additional emissions controls that could not be achieved with the Project.

L118-25

Further, the DEIR's claim that the lack of availability of Priority Reserve credits are the reason for increased costs in Alternative 4 is misleading. The DEIR states that the Priority Reserve credits are provided to small electrical generating facilities. (DEIR p. 5.15 [see footnote 1].) While that is one of the available recipients of the credits, the Project itself generates too much electricity to use Priority Reserve credits as an electrical generating facility. SCAQMD Rule 1309.1 are allowed for facilities that generate less than 10 megawatts, whereas the Project would produce 12 megawatts. This is why the Project relies on its ability to obtain Priority Reserve Credits as an essential public service instead. The DEIR provides no reason why disposing of LFG under Alternative 4 could not use Priority Reserve credits as an essential public service.

IV. Conclusion

L118-26

The DEIR is fatally flawed and must be revised to provide adequate analysis of the issues raised herein. The revised DEIR must then be recirculated pursuant to CEQA Guidelines section 15088.5, subdivision (a), since it will then contain significant new information, which should be subject to public scrutiny and comment before the City considers certifying the EIR or approving the Project.

Thank you for your time and consideration in this matter.

Sincerely,



Amy Minteer

Attachments:

L118-27

1) SCLF gas flow rates
2) Comments on Grayson Repowering Project
3) Comments on Biogas MND
4) Excerpt of Scholl Canyon Landfill Expansion Project EIR
5) Grayson Repowering Project DEIR Project Description

ATTACHMENT 1

Scholl Canyon Landfill

Flare Station Flowrates

January 2016 to August 2020

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
01/04/2016	7107
01/05/2016	7327
01/06/2016	7403
01/07/2016	7337
01/08/2016	7307
01/11/2016	7355
01/12/2016	7371
01/13/2016	7413
01/14/2016	7431
01/15/2016	7391
01/19/2016	7363
01/20/2016	7371
01/21/2016	7324
01/22/2016	7409
01/25/2016	7409
01/26/2016	7301
01/27/2016	7498
01/28/2016	7419
01/29/2016	7425
02/01/2016	7216
02/02/2016	7242
02/03/2016	7250
02/04/2016	7167
02/05/2016	7328
02/08/2016	7157
02/09/2016	7241
02/10/2016	7197
02/11/2016	7227
02/12/2016	7185
02/16/2016	7212
02/17/2016	7226
02/18/2016	7215
02/19/2016	7151
02/22/2016	7194
02/23/2016	7182
02/24/2016	7207
02/25/2016	7201
02/26/2016	7181
02/29/2016	7155
03/01/2016	7160
03/02/2016	7186

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
03/03/2016	7091
03/04/2016	7126
03/07/2016	7142
03/08/2016	7064
03/09/2016	7101
03/10/2016	7103
03/11/2016	7081
03/14/2016	7037
03/15/2016	7126
03/16/2016	7091
03/17/2016	7046
03/18/2016	7031
03/21/2016	7055
03/22/2016	7134
03/23/2016	6808
03/24/2016	7138
03/25/2016	7104
03/29/2016	7106
03/30/2016	7100
03/31/2016	7120
04/01/2016	7072
04/04/2016	7067
04/05/2016	7059
04/06/2016	7219
04/07/2016	7307
04/08/2016	7307
04/11/2016	7257
04/12/2016	7325
04/13/2016	7327
04/14/2016	7339
04/15/2016	7303
04/18/2016	7251
04/19/2016	7253
04/20/2016	7310
04/21/2016	7284
04/22/2016	7253
04/25/2016	7311
04/26/2016	7495
04/27/2016	7217
04/28/2016	7228
04/29/2016	7222

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
05/02/2016	7204
05/03/2016	6961
05/04/2016	7030
05/05/2016	6990
05/06/2016	7066
05/09/2016	6993
05/10/2016	7052
05/11/2016	6947
05/12/2016	7016
05/13/2016	6960
05/16/2016	6978
05/17/2016	6902
05/18/2016	6846
05/19/2016	6907
05/20/2016	6939
05/23/2016	6969
05/24/2016	6970
05/25/2016	6952
05/26/2016	6931
05/27/2016	6919
05/31/2016	6911
06/01/2016	6872
06/02/2016	6837
06/03/2016	6809
06/06/2016	6829
06/07/2016	6857
06/08/2016	6779
06/09/2016	6877
06/10/2016	6879
06/13/2016	6908
06/14/2016	6895
06/15/2016	6889
06/16/2016	6884
06/17/2016	6909
06/20/2016	6770
06/21/2016	6830
06/22/2016	6832
06/23/2016	6834
06/24/2016	6891
06/27/2016	6836
06/28/2016	6808

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
06/29/2016	6810
06/30/2016	6829
07/01/2016	7004
07/05/2016	7065
07/06/2016	7048
07/07/2016	7014
07/08/2016	7053
07/11/2016	7015
07/12/2016	7050
07/13/2016	7027
07/14/2016	7048
07/15/2016	7080
07/18/2016	7090
07/19/2016	6981
07/20/2016	7039
07/21/2016	7011
07/22/2016	7009
07/25/2016	7031
07/26/2016	7010
07/27/2016	7037
07/28/2016	7044
07/29/2016	7058
08/01/2016	6937
08/02/2016	6951
08/03/2016	7008
08/04/2016	6983
08/05/2016	6931
08/08/2016	6902
08/09/2016	6851
08/10/2016	6814
08/11/2016	6850
08/12/2016	6775
08/15/2016	6804
08/16/2016	6862
08/17/2016	6775
08/18/2016	6749
08/19/2016	6949
08/22/2016	6892
08/23/2016	6846
08/24/2016	6889
08/25/2016	6861

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
08/26/2016	6930
08/29/2016	6890
08/30/2016	6868
08/31/2016	6903
09/01/2016	6981
09/02/2016	7001
09/06/2016	6983
09/07/2016	6942
09/08/2016	6979
09/09/2016	6990
09/12/2016	6989
09/13/2016	6972
09/14/2016	7006
09/15/2016	6892
09/16/2016	6931
09/19/2016	6882
09/20/2016	6840
09/21/2016	6919
09/22/2016	6948
09/23/2016	6970
09/26/2016	6879
09/27/2016	6907
09/28/2016	6958
09/29/2016	7000
09/30/2016	7003
10/03/2016	7183
10/04/2016	7157
10/05/2016	7185
10/06/2016	7031
10/07/2016	7059
10/10/2016	7067
10/11/2016	7014
10/12/2016	7047
10/13/2016	7023
10/14/2016	7002
10/17/2016	6964
10/18/2016	6975
10/19/2016	6947
10/20/2016	6864
10/21/2016	6853
10/24/2016	6921

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
10/25/2016	7015
10/26/2016	7007
10/27/2016	6931
10/28/2016	6907
10/31/2016	6921
11/01/2016	6760
11/02/2016	6733
11/03/2016	6710
11/04/2016	6756
11/07/2016	6721
11/08/2016	6675
11/09/2016	6622
11/10/2016	6510
11/14/2016	6479
11/15/2016	6514
11/16/2016	6618
11/17/2016	6381
11/18/2016	6499
11/21/2016	6395
11/22/2016	6453
11/23/2016	6383
11/28/2016	6453
11/29/2016	6318
11/30/2016	5664
12/01/2016	5733
12/02/2016	5826
12/05/2016	5941
12/06/2016	5930
12/07/2016	5758
12/08/2016	5829
12/09/2016	5918
12/12/2016	5884
12/13/2016	5870
12/14/2016	5876
12/15/2016	5860
12/16/2016	5937
12/19/2016	5995
12/20/2016	5949
12/21/2016	5922
12/22/2016	5953
12/23/2016	5872

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
12/27/2016	5945
12/28/2016	6003
12/29/2016	6022
12/30/2016	6156
01/03/2017	6053
01/04/2017	5983
01/05/2017	5945
01/06/2017	5964
01/09/2017	5945
01/10/2017	5911
01/11/2017	5772
01/12/2017	5941
01/13/2017	5911
01/17/2017	6060
01/18/2017	6091
01/19/2017	6033
01/20/2017	6007
01/23/2017	5949
01/24/2017	5868
01/25/2017	5903
01/26/2017	5951
01/27/2017	5935
01/30/2017	5879
01/31/2017	5953
02/01/2017	5745
02/02/2017	5830
02/03/2017	5991
02/06/2017	5843
02/07/2017	5880
02/08/2017	5878
02/09/2017	5832
02/10/2017	5858
02/13/2017	5919
02/14/2017	5989
02/15/2017	5922
02/16/2017	5916
02/17/2017	5991
02/21/2017	5990
02/22/2017	6047
02/23/2017	6000
02/24/2017	6008

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
02/27/2017	5888
02/28/2017	5906
03/01/2017	5912
03/02/2017	6031
03/03/2017	6019
03/06/2017	5980
03/07/2017	6005
03/08/2017	5956
03/09/2017	5997
03/10/2017	5978
03/13/2017	5991
03/14/2017	5983
03/15/2017	6048
03/16/2017	5993
03/17/2017	6009
03/20/2017	6060
03/21/2017	6027
03/22/2017	6005
03/23/2017	6032
03/24/2017	6051
03/28/2017	6047
03/29/2017	6027
03/30/2017	5984
03/31/2017	6008
04/03/2017	6015
04/04/2017	6099
04/05/2017	6086
04/06/2017	6093
04/07/2017	6106
04/10/2017	6151
04/11/2017	6188
04/12/2017	6167
04/13/2017	6119
04/14/2017	6133
04/17/2017	6071
04/18/2017	6106
04/19/2017	6090
04/20/2017	6145
04/21/2017	6181
04/24/2017	6214
04/25/2017	6157

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
04/26/2017	6204
04/27/2017	6182
04/28/2017	6160
05/01/2017	6440
05/02/2017	6291
05/03/2017	6286
05/04/2017	6303
05/05/2017	6329
05/08/2017	6343
05/09/2017	6305
05/10/2017	6147
05/11/2017	6290
05/12/2017	6302
05/15/2017	6321
05/16/2017	6348
05/17/2017	6307
05/18/2017	6303
05/19/2017	6329
05/22/2017	5957
05/23/2017	6387
05/24/2017	6443
05/25/2017	6151
05/26/2017	6344
05/30/2017	6339
05/31/2017	6280
06/01/2017	6271
06/02/2017	6275
06/05/2017	6301
06/06/2017	6311
06/07/2017	6245
06/08/2017	6447
06/09/2017	6343
06/12/2017	6345
06/13/2017	6319
06/14/2017	6272
06/15/2017	6259
06/16/2017	6295
06/19/2017	6322
06/20/2017	6303
06/21/2017	6372
06/22/2017	6359

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
06/23/2017	6395
06/26/2017	6262
06/27/2017	6300
06/28/2017	6267
06/29/2017	6331
06/30/2017	6384
07/03/2017	6554
07/05/2017	6470
07/06/2017	6412
07/07/2017	6351
07/10/2017	6391
07/11/2017	6405
07/12/2017	6310
07/13/2017	6384
07/14/2017	6279
07/17/2017	6351
07/18/2017	6186
07/19/2017	6240
07/20/2017	6288
07/21/2017	6263
07/24/2017	6200
07/25/2017	6261
07/26/2017	6430
07/27/2017	6567
07/28/2017	6654
07/31/2017	6654
08/01/2017	6634
08/02/2017	6542
08/03/2017	6577
08/04/2017	6472
08/07/2017	6548
08/08/2017	6570
08/09/2017	6588
08/10/2017	6620
08/11/2017	6566
08/14/2017	6587
08/15/2017	6584
08/16/2017	6293
08/17/2017	6514
08/18/2017	6502
08/21/2017	6536

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
08/22/2017	6399
08/23/2017	6487
08/24/2017	6543
08/25/2017	6486
08/28/2017	6382
08/29/2017	6482
08/30/2017	6424
08/31/2017	6474
09/01/2017	6497
09/05/2017	6517
09/06/2017	6531
09/07/2017	6491
09/08/2017	6483
09/11/2017	6481
09/12/2017	6451
09/13/2017	6479
09/14/2017	6415
09/15/2017	6314
09/18/2017	6641
09/19/2017	6596
09/20/2017	6605
09/21/2017	6688
09/22/2017	6654
09/25/2017	6694
09/26/2017	6648
09/27/2017	6682
09/28/2017	6621
09/29/2017	6622
10/02/2017	6857
10/03/2017	6789
10/04/2017	6808
10/05/2017	6856
10/06/2017	6693
10/10/2017	6784
10/11/2017	6768
10/12/2017	6875
10/13/2017	6922
10/16/2017	6805
10/17/2017	6756
10/18/2017	6775
10/19/2017	6813

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
10/20/2017	6816
10/23/2017	6906
10/24/2017	6916
10/25/2017	6948
10/26/2017	6861
10/27/2017	6858
10/30/2017	6915
10/31/2017	6796
11/01/2017	6789
11/02/2017	6560
11/03/2017	6626
11/06/2017	6529
11/07/2017	6636
11/08/2017	6615
11/09/2017	6642
11/13/2017	6633
11/14/2017	6618
11/15/2017	6653
11/16/2017	6610
11/17/2017	6622
11/20/2017	6650
11/21/2017	6627
11/22/2017	6461
11/27/2017	6658
11/28/2017	6637
11/29/2017	6581
11/30/2017	6551
12/01/2017	6597
12/04/2017	6541
12/05/2017	6704
12/06/2017	6555
12/07/2017	6673
12/08/2017	6701
12/11/2017	6610
12/12/2017	6444
12/13/2017	6373
12/14/2017	6394
12/15/2017	6367
12/18/2017	6422
12/19/2017	6474
12/20/2017	6453

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
12/21/2017	6445
12/22/2017	6392
12/26/2017	6352
12/27/2017	6288
12/28/2017	6386
12/29/2017	6319
01/02/2018	6315
01/03/2018	6279
01/04/2018	6301
01/05/2018	6249
01/08/2018	6291
01/09/2018	6237
01/10/2018	6261
01/11/2018	6228
01/12/2018	6209
01/16/2018	6218
01/17/2018	6215
01/18/2018	6204
01/19/2018	6188
01/22/2018	6224
01/23/2018	6270
01/24/2018	6226
01/25/2018	6212
01/26/2018	6231
01/29/2018	6101
01/30/2018	6207
01/31/2018	6387
02/01/2018	6341
02/02/2018	6335
02/05/2018	6313
02/06/2018	6417
02/07/2018	6407
02/08/2018	6362
02/09/2018	6371
02/12/2018	6345
02/13/2018	6441
02/14/2018	6289
02/15/2018	6366
02/16/2018	6488
02/20/2018	6523
02/21/2018	6424

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
02/22/2018	6498
02/23/2018	6695
02/26/2018	6402
02/27/2018	6464
02/28/2018	6334
03/01/2018	6372
03/02/2018	6372
03/05/2018	6367
03/06/2018	6348
03/07/2018	6337
03/08/2018	6319
03/09/2018	6337
03/12/2018	6288
03/13/2018	6326
03/14/2018	6279
03/15/2018	6286
03/16/2018	6304
03/19/2018	6220
03/20/2018	6292
03/21/2018	6308
03/22/2018	6270
03/23/2018	6206
03/27/2018	6289
03/28/2018	6329
03/29/2018	6375
03/30/2018	6310
04/02/2018	6364
04/03/2018	6549
04/04/2018	6556
04/05/2018	6562
04/06/2018	6525
04/09/2018	6528
04/10/2018	6495
04/11/2018	6529
04/12/2018	6622
04/13/2018	6582
04/16/2018	6545
04/17/2018	6501
04/18/2018	6568
04/19/2018	6580
04/20/2018	6515

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
04/23/2018	6444
04/24/2018	6499
04/25/2018	6542
04/26/2018	6505
04/27/2018	6510
04/30/2018	6452
05/01/2018	6265
05/02/2018	6171
05/03/2018	6257
05/04/2018	6216
05/07/2018	6250
05/08/2018	6235
05/09/2018	6236
05/10/2018	6178
05/11/2018	6279
05/14/2018	6447
05/15/2018	6435
05/16/2018	6445
05/17/2018	6498
05/18/2018	6434
05/21/2018	6337
05/22/2018	6370
05/23/2018	6397
05/24/2018	6391
05/25/2018	6447
05/29/2018	6415
05/30/2018	6453
05/31/2018	6368
06/01/2018	6430
06/04/2018	6356
06/05/2018	6454
06/06/2018	6441
06/07/2018	6435
06/08/2018	6369
06/11/2018	6425
06/12/2018	6440
06/13/2018	6472
06/14/2018	6442
06/15/2018	6356
06/18/2018	6501
06/19/2018	6410

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
06/20/2018	6453
06/21/2018	6470
06/22/2018	6403
06/25/2018	6420
06/26/2018	6467
06/27/2018	6459
06/28/2018	6499
06/29/2018	6435
07/02/2018	6625
07/03/2018	6608
07/05/2018	6612
07/06/2018	6555
07/09/2018	6627
07/10/2018	6628
07/11/2018	6640
07/12/2018	6612
07/13/2018	6626
07/16/2018	6624
07/17/2018	6658
07/18/2018	6641
07/19/2018	6611
07/20/2018	6659
07/23/2018	6588
07/24/2018	6545
07/25/2018	6657
07/26/2018	6698
07/27/2018	6702
07/30/2018	6696
07/31/2018	6677
08/01/2018	6474
08/02/2018	6776
08/03/2018	6635
08/06/2018	6670
08/07/2018	6699
08/08/2018	6709
08/09/2018	6715
08/10/2018	6785
08/13/2018	6803
08/14/2018	6673
08/15/2018	6784
08/16/2018	6789

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
08/17/2018	6802
08/20/2018	6772
08/21/2018	6751
08/22/2018	6682
08/23/2018	6831
08/24/2018	6852
08/27/2018	6836
08/28/2018	6811
08/29/2018	6858
08/30/2018	6844
08/31/2018	6734
09/04/2018	6833
09/05/2018	6772
09/06/2018	6752
09/07/2018	6680
09/10/2018	6732
09/11/2018	6728
09/12/2018	6773
09/13/2018	6745
09/14/2018	6789
09/17/2018	6851
09/18/2018	6790
09/19/2018	6748
09/20/2018	6855
09/21/2018	6771
09/24/2018	6770
09/25/2018	6831
09/26/2018	6735
09/27/2018	6799
09/28/2018	6762
10/01/2018	6561
10/02/2018	6495
10/03/2018	6503
10/04/2018	6517
10/05/2018	6515
10/09/2018	6564
10/10/2018	6550
10/11/2018	6475
10/12/2018	6499
10/15/2018	6496
10/16/2018	6471

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
10/17/2018	6443
10/18/2018	6519
10/19/2018	6499
10/22/2018	6446
10/23/2018	6517
10/24/2018	6522
10/25/2018	6552
10/26/2018	6568
10/29/2018	6595
10/30/2018	6565
10/31/2018	6509
11/01/2018	6558
11/02/2018	6553
11/05/2018	6500
11/06/2018	6504
11/07/2018	6508
11/08/2018	6509
11/13/2018	6516
11/14/2018	6505
11/15/2018	6531
11/16/2018	6582
11/19/2018	6562
11/20/2018	6566
11/21/2018	6610
11/26/2018	6524
11/27/2018	6575
11/28/2018	6662
11/29/2018	6566
11/30/2018	6605
12/03/2018	6856
12/04/2018	6866
12/05/2018	6803
12/06/2018	6785
12/07/2018	6759
12/10/2018	6759
12/11/2018	6719
12/12/2018	6739
12/13/2018	6740
12/14/2018	6771
12/17/2018	6688
12/18/2018	6754

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
12/19/2018	6766
12/20/2018	6749
12/21/2018	6768
12/24/2018	6793
12/26/2018	6718
12/27/2018	6701
12/28/2018	6753
12/31/2018	6857
01/02/2019	6650
01/03/2019	6505
01/04/2019	6515
01/07/2019	6573
01/08/2019	6553
01/09/2019	6574
01/10/2019	6656
01/11/2019	6655
01/14/2019	6661
01/15/2019	6635
01/16/2019	6389
01/17/2019	6331
01/18/2019	6501
01/22/2019	6709
01/23/2019	6623
01/24/2019	6628
01/25/2019	6583
01/28/2019	6549
01/29/2019	6518
01/30/2019	6419
01/31/2019	6683
02/01/2019	6583
02/04/2019	6792
02/05/2019	6708
02/06/2019	6721
02/07/2019	6616
02/08/2019	6677
02/11/2019	6750
02/12/2019	6771
02/13/2019	6785
02/14/2019	6712
02/15/2019	6641
02/19/2019	6682

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
02/20/2019	6771
02/21/2019	6687
02/22/2019	6655
02/25/2019	6588
02/26/2019	6542
02/27/2019	6622
02/28/2019	6719
03/01/2019	6775
03/04/2019	6827
03/05/2019	6901
03/06/2019	7012
03/07/2019	6789
03/08/2019	6829
03/11/2019	6922
03/12/2019	6885
03/13/2019	6887
03/14/2019	6803
03/15/2019	6927
03/18/2019	6794
03/19/2019	6802
03/20/2019	6610
03/21/2019	6700
03/22/2019	6764
03/26/2019	6789
03/27/2019	6773
03/28/2019	6641
03/29/2019	6530
04/01/2019	6417
04/02/2019	6550
04/03/2019	6601
04/04/2019	6560
04/05/2019	6269
04/08/2019	6315
04/09/2019	6330
04/10/2019	6353
04/11/2019	6375
04/12/2019	6270
04/15/2019	6348
04/16/2019	6350
04/17/2019	6339
04/18/2019	6304

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
04/19/2019	6245
04/22/2019	6319
04/23/2019	6318
04/24/2019	6310
04/25/2019	6308
04/26/2019	6380
04/29/2019	6374
04/30/2019	6455
05/01/2019	6501
05/02/2019	6483
05/03/2019	6513
05/06/2019	6402
05/07/2019	6532
05/08/2019	6553
05/09/2019	6475
05/10/2019	6479
05/13/2019	6500
05/14/2019	6449
05/15/2019	6424
05/16/2019	6422
05/17/2019	6421
05/20/2019	6547
05/21/2019	6583
05/22/2019	6597
05/23/2019	6537
05/24/2019	6503
05/28/2019	6555
05/29/2019	6494
05/30/2019	6537
05/31/2019	6627
06/03/2019	6426
06/04/2019	6629
06/05/2019	6588
06/06/2019	6503
06/07/2019	6456
06/10/2019	6470
06/11/2019	6201
06/12/2019	6472
06/13/2019	6301
06/14/2019	6336
06/17/2019	6546

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
06/18/2019	6555
06/19/2019	6535
06/20/2019	6601
06/21/2019	6595
06/24/2019	6569
06/25/2019	6579
06/26/2019	6444
06/27/2019	6545
06/28/2019	6499
07/01/2019	6458
07/02/2019	6514
07/03/2019	6477
07/05/2019	6460
07/08/2019	6546
07/09/2019	6551
07/10/2019	6501
07/11/2019	6493
07/12/2019	6501
07/15/2019	6609
07/16/2019	6605
07/17/2019	6574
07/18/2019	6588
07/19/2019	6598
07/22/2019	6574
07/23/2019	6884
07/24/2019	6850
07/25/2019	6905
07/26/2019	6866
07/29/2019	6817
07/30/2019	6792
07/31/2019	6856
08/01/2019	6934
08/02/2019	6936
08/05/2019	6955
08/06/2019	6940
08/07/2019	6799
08/08/2019	6903
08/09/2019	6919
08/12/2019	6895
08/13/2019	6875
08/14/2019	6852

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
08/15/2019	6889
08/16/2019	6729
08/19/2019	6595
08/20/2019	6742
08/21/2019	6621
08/22/2019	6778
08/23/2019	6716
08/26/2019	6734
08/27/2019	6689
08/28/2019	6651
08/29/2019	6881
08/30/2019	6573
09/03/2019	6765
09/04/2019	6687
09/05/2019	6972
09/06/2019	7059
09/09/2019	7023
09/10/2019	6955
09/11/2019	7004
09/12/2019	7020
09/13/2019	7033
09/16/2019	7053
09/17/2019	7048
09/18/2019	7057
09/19/2019	7111
09/20/2019	7069
09/23/2019	7080
09/24/2019	7073
09/25/2019	7030
09/26/2019	7057
09/27/2019	7051
09/30/2019	6934
10/01/2019	6990
10/02/2019	7061
10/03/2019	7040
10/04/2019	6988
10/07/2019	7009
10/08/2019	7008
10/09/2019	7017
10/10/2019	6995
10/11/2019	7005

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
10/15/2019	6990
10/16/2019	7023
10/17/2019	6972
10/18/2019	6924
10/21/2019	7027
10/22/2019	7040
10/23/2019	7012
10/24/2019	6992
10/25/2019	7055
10/28/2019	7066
10/29/2019	7047
10/30/2019	7057
10/31/2019	7067
11/01/2019	7054
11/04/2019	6937
11/05/2019	6881
11/06/2019	7004
11/07/2019	6955
11/08/2019	6862
11/12/2019	6880
11/13/2019	6984
11/14/2019	6938
11/15/2019	6911
11/18/2019	6875
11/19/2019	6913
11/20/2019	7003
11/21/2019	6961
11/22/2019	6985
11/25/2019	6988
11/26/2019	6975
11/27/2019	6984
12/02/2019	7157
12/03/2019	7098
12/04/2019	7102
12/05/2019	7003
12/06/2019	7094
12/09/2019	6943
12/10/2019	6954
12/11/2019	6960
12/12/2019	7014
12/13/2019	6997

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
12/16/2019	7104
12/17/2019	7108
12/18/2019	7003
12/19/2019	6705
12/20/2019	6944
12/23/2019	6915
12/24/2019	6903
12/26/2019	6993
12/27/2019	7040
12/30/2019	6986
12/31/2019	6886
01/02/2020	6786
01/03/2020	6714
01/06/2020	6670
01/07/2020	6698
01/08/2020	6755
01/09/2020	6733
01/10/2020	6628
01/13/2020	6594
01/14/2020	6501
01/15/2020	6587
01/16/2020	6541
01/17/2020	6521
01/21/2020	6511
01/22/2020	6503
01/23/2020	6493
01/24/2020	6450
01/27/2020	6424
01/28/2020	6366
01/29/2020	6417
01/30/2020	6605
01/31/2020	6605
02/03/2020	6730
02/04/2020	6718
02/05/2020	6681
02/06/2020	6702
02/07/2020	6708
02/10/2020	6629
02/11/2020	6642
02/12/2020	6707
02/13/2020	6699

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
02/14/2020	6619
02/18/2020	6673
02/19/2020	6615
02/20/2020	6631
02/21/2020	6549
02/24/2020	6678
02/25/2020	6670
02/26/2020	6704
02/27/2020	6559
02/28/2020	6642
03/02/2020	6801
03/03/2020	6818
03/04/2020	6691
03/05/2020	6848
03/06/2020	6827
03/09/2020	6902
03/10/2020	6853
03/11/2020	6807
03/12/2020	6791
03/13/2020	6815
03/16/2020	6605
03/17/2020	6917
03/18/2020	6992
03/19/2020	6605
03/20/2020	6887
03/23/2020	6777
03/24/2020	6850
03/25/2020	6901
03/26/2020	6753
03/27/2020	6752
03/31/2020	6802
04/01/2020	6515
04/02/2020	6522
04/03/2020	6550
04/06/2020	6597
04/07/2020	6520
04/08/2020	6501
04/09/2020	6588
04/10/2020	6532
04/13/2020	6503
04/14/2020	6475

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
04/15/2020	6487
04/16/2020	6534
04/17/2020	6536
04/20/2020	6537
04/21/2020	6454
04/22/2020	6456
04/23/2020	6433
04/24/2020	6479
04/27/2020	6466
04/28/2020	6484
04/29/2020	6475
04/30/2020	6502
05/01/2020	6463
05/04/2020	6457
05/05/2020	6471
05/06/2020	6494
05/07/2020	6520
05/08/2020	7048
05/11/2020	7070
05/12/2020	7090
05/13/2020	7078
05/14/2020	7088
05/15/2020	7074
05/18/2020	7069
05/19/2020	7122
05/20/2020	7100
05/21/2020	7068
05/22/2020	7022
05/26/2020	7020
05/27/2020	7027
05/28/2020	7087
05/29/2020	7086
06/01/2020	7126
06/02/2020	7164
06/03/2020	7181
06/04/2020	7143
06/05/2020	7177
06/08/2020	7150
06/09/2020	7170
06/10/2020	7186
06/11/2020	7222

Scholl Canyon Landfill
Flare Station Flow from:
01/01/2016 to 08/20/2020

Date	Flow (cfm)
06/12/2020	7215
06/15/2020	7183
06/16/2020	7205
06/17/2020	7195
06/18/2020	7214
06/19/2020	6978
06/22/2020	7216
06/23/2020	7244
06/24/2020	7227
06/25/2020	7057
06/26/2020	7215
06/29/2020	7188
06/30/2020	7199
07/01/2020	138
07/02/2020	7088
07/06/2020	7055
07/07/2020	7088
07/08/2020	6884
07/09/2020	6963
07/10/2020	7031
07/13/2020	7101
07/14/2020	7145
07/15/2020	7135
07/16/2020	7099
07/17/2020	7022
07/20/2020	7144
07/21/2020	7138
07/22/2020	7174
07/23/2020	7237
07/24/2020	7107
07/27/2020	7100
07/28/2020	7070
07/29/2020	7031
07/30/2020	7045
07/31/2020	6968
08/03/2020	7009

ATTACHMENT 2

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August 2, 2018

Via Email and U.S. Mail
City Council
City of Glendale
633 E. Broadway, Room 103
Glendale, CA 91206

Re: Comments on Grayson Repowering Project

Honorable Councilmembers,

On behalf of the Glenoaks Canyon Homeowners Association (GOCHA), we provide these comments on the improper segmentation of the Grayson Repowering Project from the fundamentally linked Biogas Renewable Generation Project ("Biogas Project") and Scholl Canyon Landfill Expansion Project. These projects are part of the whole of an action by the City and as such should be analyzed in the same environmental review document.

CEQA requires that environmental review documents analyze "the whole of an action" (CEQA Guidelines § 15378) and not evade comprehensive CEQA analysis by splitting projects into separate pieces for purposes of environmental review. "One way to evaluate which acts are part of a project is to examine how closely related the acts are to the overall objective of the project." (*Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1226.) Here, the Biogas Project and the Grayson Repowering Project have the identical objective of providing local power generation, and the Biogas Project would generate that power through the use of gas produced at the Scholl Canyon Landfill, gas which is currently used for power generation at the Grayson Power Plant. The EIR for the Grayson Repowering Project acknowledges the interconnected nature of these projects, stating that the pipeline currently transporting landfill gas to the Grayson Power Plant would be decommissioned as part of the Biogas

Project, eliminating the use of landfill gas for power generation at the Grayson Power Plant. (Grayson Repowering Project EIR pp. 3.1, 3.11.)

The relationship in time, physical location and entity undertaking the actions is also a clear indicator that these three projects are part of the whole of a single project that should be analyzed jointly in an EIR. All three projects are currently under consideration by the City. The Scholl Canyon Landfill and the Grayson Power Plant are currently linked by pipeline and the Biogas Project would be constructed on the Scholl Canyon Landfill site. Further, the City is the project proponent and entity undertaking all three projects.

These three projects make up the whole of the City's CEQA project. "The idea that all integral activities are part of the same CEQA project does not establish that *only* integral activities are part of the same CEQA project." (*Tuolumne County Citizens, supra*, 155 Cal.App.4th 1214, 1229, emphasis in original.) The Grayson Repowering Project, Biogas Project and Scholl Canyon Landfill Expansion Project were always intended to be implemented hand in hand. The City cannot now evade full CEQA review of the projects by segmenting review of the Grayson Repowering Project from review of the Biogas Project and the Scholl Canyon Landfill Expansion Project. The City recently decided to prepare an EIR for the Biogas Project instead of a mitigated negative declaration. The completed EIR for the Scholl Canyon Landfill Expansion Project is pending City Council certification.

The failure to analyze these projects in one EIR has resulted in a failure to address potential impacts. For example, the landfill gas from the Scholl Canyon Landfill is currently processed at the Grayson Power Plant. As part of the Grayson Repowering Project and the Biogas Project, a new power generating plant would take over the processing of this landfill gas. By failing to analyze these projects in the same environmental review document, the City has failed to acknowledge that these combined projects would result in an expansion of the capacity of Grayson Power Plant for additional production requiring new and additional powering sources. Additionally, the Biogas Project would rely on the continued operation of the Scholl Canyon Landfill, which is predicted to reach capacity within 10 years, and thus is also intertwined with the Scholl Canyon Landfill Expansion Project.

The City's improper segmentation of the three projects further results in an inadequate and improperly limited analysis of alternatives. The consideration of the Grayson Repowering Project prior to the other projects commits the City to a course of

action without a full analysis of alternatives. The Grayson Repowering Project fails to consider an alternative that would allow for the continued use of gas from the Scholl Canyon Landfill at the existing power plant. This failure, due in large part to the improper segmentation of the three projects, pre-commits the City to the construction of a new power plant to use the landfill gas.

Additional alternatives that take the whole of the project into consideration should have been analyzed, including:

- Thorough cleaning of biogas from the landfill at the landfill and injecting it into natural gas pipelines for distribution, eliminating the need for a new biogas power plant.
- Sending the cleaned landfill biogas to the Repowered Grayson Plant through the existing pipeline where it could continue to be used for a portion of the power generation.
- Biogas could also be used to develop vehicle fuels instead of power generation.

All of these alternatives would have the added benefit of eliminating the proposed new biogas plant. Elimination of a new biogas plant would also eliminate the incentive to further extend the life and boundaries of the Scholl Canyon Landfill to justify the expense of constructing a new biogas plant.

We urge you to carefully consider these issues prior to the approval of the Grayson Repowering Project. Thank you for your time and consideration in this matter.

Sincerely,



Amy Minteer

ATTACHMENT 3

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November 7, 2017

Via Email and U.S. Mail
Dennis Joe
Case Planner
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633 E. Broadway, Room 103
Glendale, CA 91206
djoe@glendaleca.gov

Re: Comments on Mitigated Negative Declaration for Biogas Renewable Generation Project

Dear Mr. Joe,

On behalf of the Glenoaks Canyon Homeowners Association (GOCHA), we provide these comments on the Mitigated Negative Declaration (MND) for the Biogas Renewable Generation Project ("Biogas Project"). These comments supplement the comment letter submitted by GOCHA on October 19, 2017. The Biogas Project would be developed on the Scholl Canyon Landfill site and would rely on methane from the landfill to generate power. Currently, the methane produced by the Scholl Canyon Landfill is processed at the Grayson Power Plant.

We reiterate that the approval of the Biogas Project would violate the California Environmental Quality Act (CEQA) because the proposed MND is inadequate and inaccurate; an environmental impact report (EIR) should have been prepared to analyze the potentially significant impacts associated with this Project. An EIR must be prepared instead of a MND when there is substantial evidence to support a fair argument that the project may have significant adverse environmental impacts. (Public Resources Code § 21151.) "The fair argument standard is a 'low threshold' test for requiring the preparation of an EIR." (*Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928.) "If there is substantial evidence of a significant environmental

impact, evidence to the contrary does not dispense with the need for an EIR when it can still be 'fairly argued' that the project may have a significant impact." (*Friends of "B" Street v. City of Hayward* (1980) 106 Cal.App.3d 988, 1001; *see also* CEQA Guidelines § 15064.)

Additionally, the MND, and the initial study upon which it relies, must provide the lead agency with adequate information regarding a project to determine the appropriate environmental review document and "documentation of the factual basis for the finding in a negative declaration that a project will not have a significant effect on the environment." (*Ctr. for Sierra Nevada Conservation v. County of El Dorado* (2012) 202 Cal. App. 4th 1156, 1170.) There must be a basis within the record to support the conclusions reached by the initial study. (*Lighthouse Field Beach Rescue v. City of Santa Cruz* (2005) 131 Cal.App.4th 1170, 1201.) "Where an agency. . . fails to gather information and undertake an adequate environmental analysis in its initial study, a negative declaration is inappropriate." (*El Dorado County Taxpayers for Quality Growth v. County of El Dorado* (2004) 122 Cal. App. 4th 1591, 1597.) In addition to the information failures documented in GOCHA's previous comment letter, the MND also fails to address the reasonably foreseeable consequences of the Biogas Project and the cumulative air quality impacts.

CEQA requires the analysis of a project's impacts resulting from the reasonably foreseeable consequences of the project. (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 396.) Here, the Biogas Project would rely on landfill gas generated by the Scholl Canyon Landfill to generate electricity. Thus, the continued operation of the Scholl Canyon Landfill is necessary for the Biogas Project. Under current use, the Scholl Canyon Landfill is predicted to reach capacity by 2021. (Scholl Canyon Expansion EIR p. 1-3, incorporated by reference.) However, a project to expand this capacity and continue operating the Scholl Canyon Landfill has been proposed. As set forth in GOCHA's previous comment letter, the City has improperly segmented the environmental review for these intertwined projects. By expending funds and constructing a new power plant to generate electricity from landfill gas, the Biogas Project would enhance the need for landfill expansion. This is a reasonably foreseeable indirect impact that should have been analyzed but was not. Similarly, the City's proposed plan to install an anaerobic digester at the Scholl Canyon Landfill, which would breakdown organic landfill waste into methane that could also be used to operate the Biogas Project, should have been analyzed a reasonably foreseeable future consequence of the Project and as a cumulative project.

Additionally, GOCHA agrees with the South Coast Air Quality Management District that the MND lacks the required analysis of the cumulative air quality of the

Biogas Project and the Grayson Repowering Project. The landfill gas from the Scholl Canyon Landfill is currently processed at the Grayson Power Plant. (The DEIR for Grayson Repowering Project is incorporated by reference and located at: http://www.glendaleca.gov/home/showdocument?id=38818.) The Biogas Project would take over the processing of this landfill gas, expanding the capacity of Grayson Power Plant for additional production requiring new powering sources.

The MND fails to analyze the cumulative impacts of the operation of both the Grayson Repowering Project and the Biogas Project. This failure is based on a faulty definition of cumulatively considerable impacts. The MND acknowledges that "PM10 and PM2.5 background ambient concentrations already exceed federal or state standards", but discounts the possibility of a cumulative impact based on a claim that the Project level impacts do not exceed significance thresholds. (MND p. 3.3.24.) CEQA cases have repeatedly overruled such findings.

> One of the most important environmental lessons evident from past experience is that environmental damage often occurs incrementally from a variety of small sources. These sources appear insignificant, assuming threatening dimensions only when considered in light of the other sources with which they interact. Perhaps the best example is air pollution, where thousands of relatively small sources of pollution cause a serious environmental health problem.

(Kings County Farm Bureau v. City of Hanford (1990) 221 Cal.App.3d 692, 720.) The MND's failure to analyze the cumulative air quality impacts of the Biogas Project and Grayson Repowering Project must be rectified. As the particulate matter emissions are already at significantly adverse levels, the additional emissions that would result from the operation of these two projects would be a significant cumulative impact that must be analyzed in an EIR.

Thank you for your time and consideration in this matter. We look forward to the City promptly addressing this issue.

Sincerely,



Amy Minteer

ATTACHMENT 4

SECTION 3.0
EXISTING FACILITIES AND OPERATIONS

3.0 EXISTING FACILITIES AND OPERATIONS

3.1 PROJECT LOCATION

The project site is located in Los Angeles County, at 3001 Scholl Canyon Road, Glendale, California, 91206. Regional access to the landfill is from the Ventura Freeway (State Route (SR) 134) at the Figueroa Street exit. Public access is only from Scholl Canyon Road. Figure 3-1 shows the location of the Scholl Canyon Landfill (SCLF) and Figure 3-2 shows the landfill facilities discussed below.

3.2 PROJECT BACKGROUND

3.2.1 HISTORY OF THE SCHOLL CANYON LANDFILL

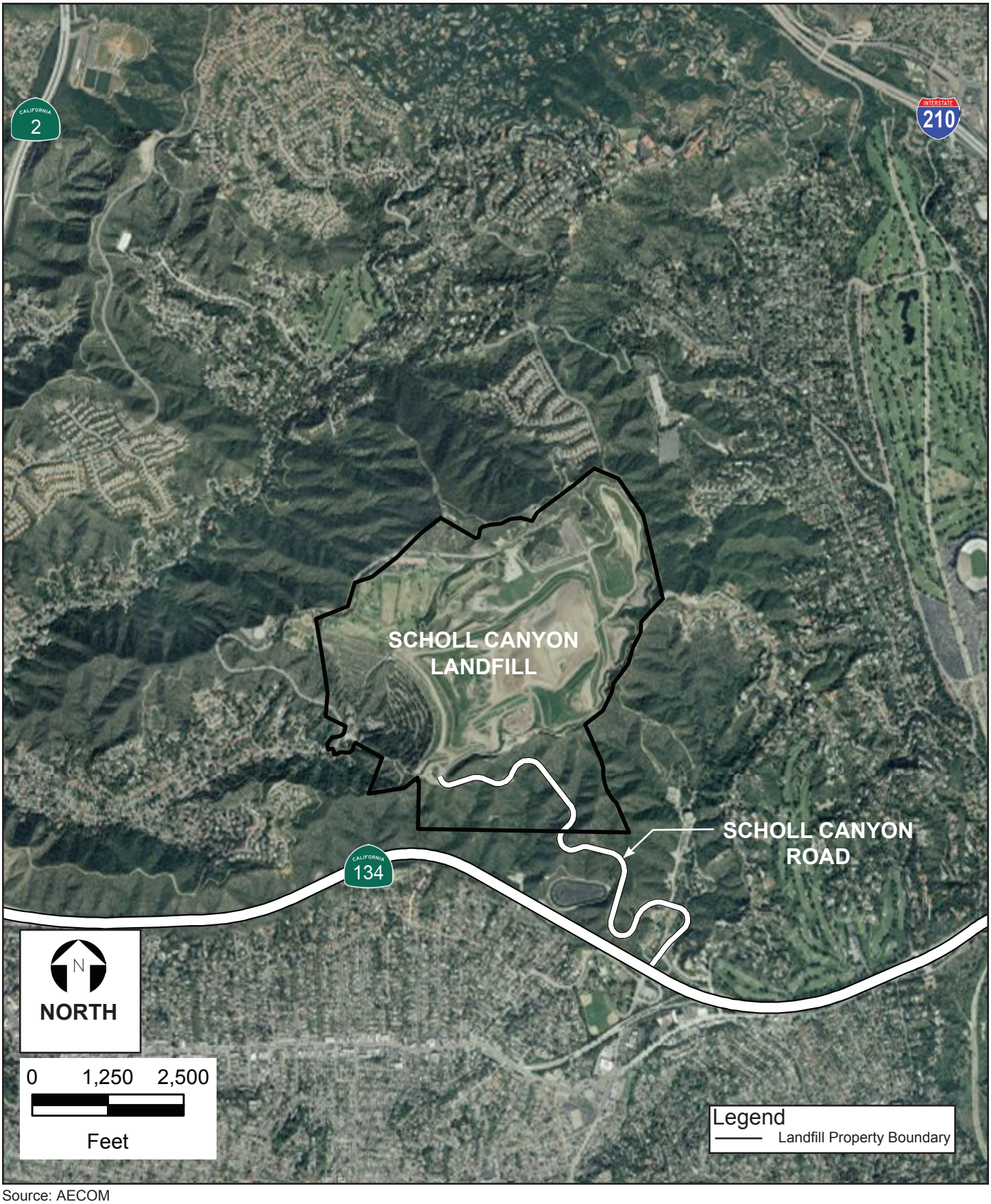
The SCLF opened in 1961, and is owned by the City of Glendale (City). The SCLF is operated by the County Sanitation District No. 2 of Los Angeles County serving as the administrative entity for the Sanitation Districts of Los Angeles County (Sanitation Districts) pursuant to a Joint Powers Agreement (JPA) between the City, County of Los Angeles (County), and Sanitation Districts. Landfilling operations were initially conducted in Scholl Canyon and subsequently moved to an adjacent canyon to the north. Near the end of the life of the northern canyon in 1975, landfilling operations resumed in the main Scholl Canyon. The northern canyon (which is not part of this project) is currently owned and maintained by the City and includes the Scholl Canyon Golf Course. Since 1975, landfilling operations have only been conducted in the main Scholl Canyon.

The landfill site occupies approximately 535 acres with 345 owned by the City, 60 acres owned by Los Angeles County and 25 acres owned by Southern California Edison (SCE). The area owned by Los Angeles County is not certified for landfill operations. The northern inactive portion of the site is approximately 126 acres. The active site is 314 acres, within which refuse has been landfilled on 239 acres and the balance consists of soil stockpiles, native areas, the scales facility, site operations facilities, and a debris basin.

SCE has ownership of a 25-acre parcel at SCLF on which it maintains power lines that transverse the landfill. In 1995, the Sanitation Districts (on behalf of the City) began working with SCE to pursue raising the power lines to allow for refuse placement up to an elevation of 1,475 feet within the SCE right-of-way. The power lines were raised in the year 2000 and the Sanitation Districts entered into a temporary entry agreement with SCE that allowed for refuse placement within the SCE right-of-way until December 31, 2005. The Sanitation Districts also entered into a license agreement with SCE in 1999 that allowed for vehicular access through the SCE right-of-way until November 30, 2014.

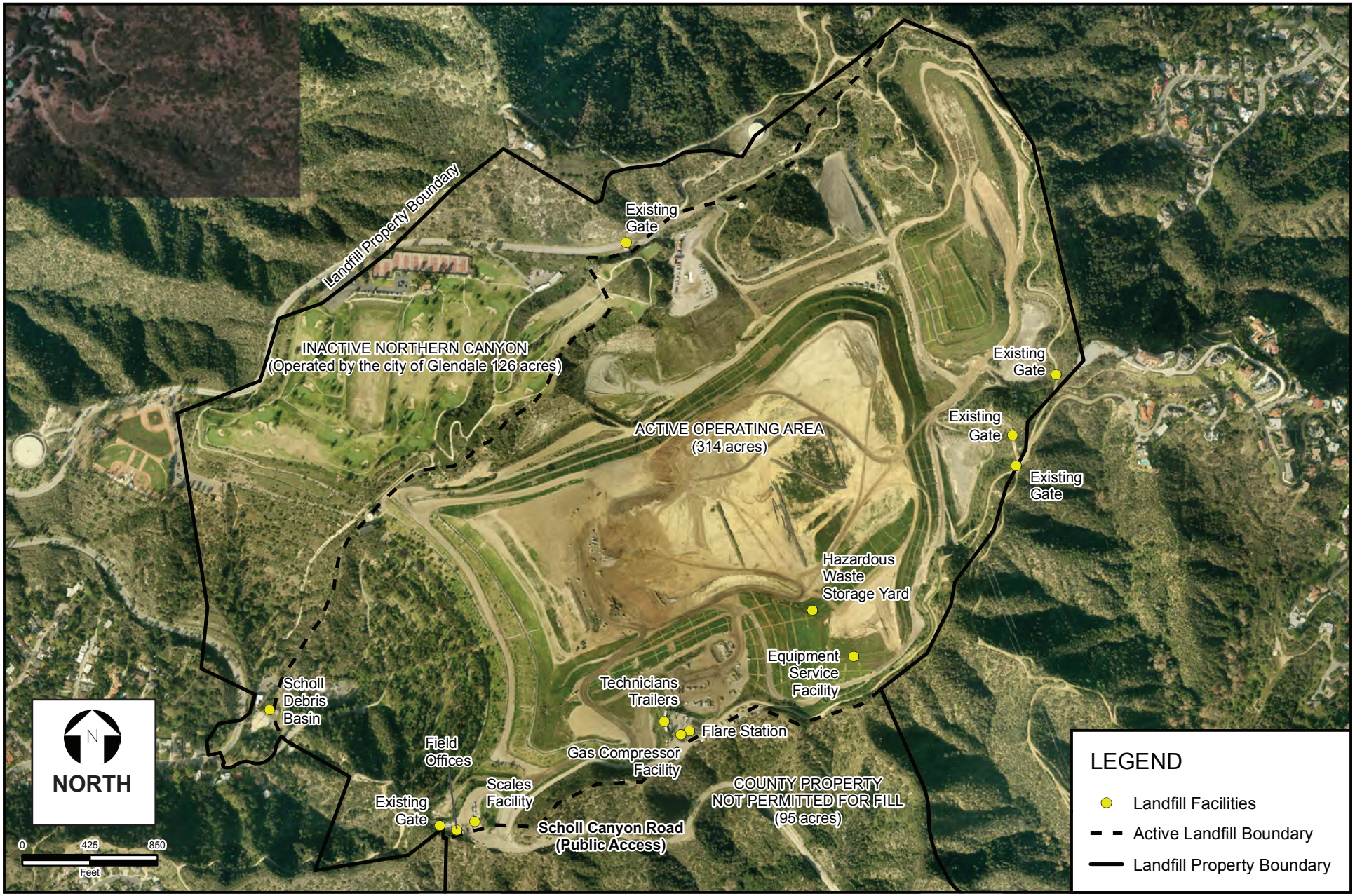
During the mid-1980s, the amount of waste received at the SCLF increased significantly. In response, the City passed two ordinances on October 6, 1987. Ordinance No. 4780 limited use of the site to a wasteshed comprised of the following cities and communities: Glendale, La Canada-Flintridge, Pasadena, San Marino, Sierra Madre, South Pasadena, and the unincorporated Los Angeles County communities of Altadena, La Crescenta, Montrose, and East Pasadena. Ordinance No. 4781 limited the waste received for disposal to 33,600 tons per week (5,600 tons per day), Monday through Saturday. However, the current permit limits disposal to only 20,400 tons per week.

The SCLF is a Class III solid waste facility. All Class III solid waste facilities are required to have a Solid Waste Facility Permit (SWFP) issued by the Local Enforcement Agency (LEA) with concurrence by the California Department of Resources Recycling and Recovery (CalRecycle), previously the Integrated Waste Management Board (CIWMB). The SCLF is currently operating under SWFP No. 19-



Source: AECOM

Figure 3-1
Location Map



Source: Sanitation Districts of Los Angeles County 2011

Figure 3-2
Landfill Facilities

AA-0012 issued by the LEA (County of Los Angeles Department of Public Health (LADPH)) on May 17, 2002. The SWFP is reviewed by CalRecycle and LADPH every five years. The last five-year review process was concluded in December 2009. The SWFP for the SCLF currently permits the site to receive a maximum of 3,400 tons per day (TPD) for disposal, based on a six-day week. At the time the Notice of Preparation for this effort was issued, approximately 1,400 TPD of solid waste were disposed at the site (baseline tonnage).

The gross capacity for the site (including the northern canyon) is approximately 33.3 million tons. Through December 2010, approximately 28.5 million tons of refuse have been disposed in the SCLF. Of this quantity, approximately 4.5 million tons were placed in the northern canyon before it became inactive in 1975, and approximately 24.0 million tons of refuse have been disposed in the main Scholl Canyon.

The remaining fully permitted capacity of the SCLF (as of December 2010) is approximately 4.8 million tons as described above. Fill is being placed in accordance with the final fill plan which will reach a maximum elevation of 1,525 feet above mean sea level (AMSL), with an average top deck elevation of approximately 1,500 feet AMSL. At the baseline tonnage of 1,400 TPD, the site would reach its currently permitted capacity at the end of the year 2021.

3.2.2 Projected Waste Management Needs for Los Angeles County

Under its current SWFP and at the baseline tonnage of 1,400 TPD, the SCLF is projected to close by the end of 2021 at which time disposal alternatives would be required for the City and other regular users of the landfill. If the rate of disposal were to increase to the currently permitted maximum of 3,400 TPD, the SCLF could reach capacity as soon as 2015. Currently, there are only four other operating landfills within Los Angeles County that are available to jurisdictions within the SCLF wasteshed (Antelope Valley, Chiquita Canyon, Lancaster, and Sunshine Canyon). The Puente Hills Landfill closed for the receipt of refuse on October 31, 2013 and has increased the demand on these remaining landfills. Future in-county disposal options will therefore be very limited.

3.3 CURRENT OPERATIONS AT THE SCHOLL CANYON LANDFILL

3.3.1 SITE ACCESS

Public access to the landfill is from the Scholl Canyon Road extension of Figueroa Street north of the SR- 134. The landfill has a gated and signed entrance. Signs posted at the entrance identify the name of the facility, owner and operator, telephone numbers, hours of operation, site restrictions (including disposal restrictions), and a schedule of rates. Posted along the main access road are various traffic signs displaying the speed limit and upcoming turns. Emergency access is available on the western side via Scholl Canyon Park, and on the northern side adjacent to the golf course.

3.3.2 ANCILLARY FACILITIES

3.3.2.1 Scales Facility

The site's scales facility consists of four electronic computer-linked weigh scales and two scale houses. Signs posted at the scales facility indicate site restrictions, special notices, and the schedule of rates. Signs also instruct drivers on how to proceed through the scales.

3.3.2.2 Internal Roads

The SCLF has a number of internal roads. The access road from the scales facility divides into two unpaved roads to the operating area. Other internal site roads are limited to site personnel. A paved road leads from the scales facility to the technicians' trailers and the flare station. Various unpaved roads provide access to the potable water supply storage tanks, reclaimed water storage tanks, the condensate collection system, and the desilting basin. Unpaved roads on the benches are utilized by site personnel for monitoring and maintenance purposes. An unpaved road provides access between the active Scholl Canyon and the inactive northern canyon. Site personnel also have access to the unpaved San Rafael Hills fire roads around the site.

3.3.2.3 Field Offices

The site field office is located adjacent to the scales facility along with a trailer containing a restroom and shower. The technicians' trailer is located near the flare station, as is the main employee parking area. In addition, storage sheds, a trailer used by the grounds maintenance crew, and a trailer for the lunchroom, restrooms, and showers are also located in this area.

3.3.2.4 Equipment Service Facility

The site's equipment service facility is used to provide most maintenance for landfill equipment. A few specialized jobs are completed off site. This facility consists of several trailers used for parts storage and offices for the mechanics. Also located in this area are three above-ground diesel storage tanks (all with secondary containment) that are used for fueling the site's heavy-duty equipment, and an equipment wash area consisting of a concrete pad and clarifier with recirculation pump and filtration equipment.

3.3.2.5 Hazardous Waste Storage Yard

The hazardous waste storage yard is used for temporary storage of hazardous materials removed from the landfill. The construction and monitoring of the hazardous waste storage area comply with the requirements of Title 22 of the California Code of Regulations (22 CCR) for this type of facility. The storage area is lined with asphalt concrete pavement and a synthetic liner, surrounded by a containment berm, enclosed with a locked chain link fence, and posted with warning signs indicating the presence of hazardous material.

3.3.3 PERSONNEL

The number of employees needed to operate and maintain a sanitary landfill is a function of the hours the facility is open, the daily tonnage received, the number and size of materials recovery programs, and the overall acreage to be maintained. Approximately 30 full-time employees currently work at the SCLF including operators, waste inspectors, heavy equipment operators, maintenance and construction workers, landscape maintenance workers, welders, engineer, and engineering technicians. Other off site employees such as office engineering staff, regulatory monitoring and reporting staff, planning and permitting staff, and surveyors support the landfill. Temporary employees are utilized to provide additional labor during peak work periods and when otherwise necessary. Contractors are utilized for larger construction projects such as expanding the landfill gas collection system and paving roads.

3.3.4 EQUIPMENT

Equipment used at the landfill is listed below. Standby equipment is usually available on site or can be readily transferred from other landfill sites operated by the Sanitation Districts. Should a situation arise where other equipment is needed, it can also be rented from nearby vendors.

- Crawler tractors (bulldozers) used for spreading and compacting waste, ripping soil, placing and compacting cover, building haul roads, and other earthwork operations.
- Scrapers for hauling and placing cover material and road base.
- Refuse compactors.
- Water trucks for dust control.
- Other equipment for landfill and materials recovery operations.

3.3.5 LANDFILLING OPERATIONS

The SCLF SWFP allows the site to be open to the public for disposal of refuse and other permitted materials from 8:00 A.M. to 5:00 P.M., six days a week (Monday through Saturday), with the exception of certain holidays. The normal hours for Sanitation Districts operation at Scholl Canyon typically extend from 6:00 A.M. to 8:00 P.M. Operations staff begins activities such as equipment maintenance and preparation, and road cleaning prior to opening the facility for public access. After the site closes to the public, cover placement is completed, equipment maintenance is performed and activities necessary to secure the site for the evening are completed. Operation of the site may extend outside of the normal operating hours when unusual circumstances or emergency situations arise.

Wastes disposed at the SCLF are limited to nonhazardous solid wastes and inert wastes not prohibited from disposal. According to 27 CCR §20220(a), nonhazardous solid waste means all putrescible[1] and non-putrescible solid, semi-solid, and liquid wastes including garbage, trash, refuse, paper, rubbish, ashes, industrial wastes, demolition and construction wastes, abandoned vehicles and parts thereof, discarded home and industrial appliances, manure, vegetable or animal solid and semi-solid wastes, and other discarded solid or semisolid wastes. Pursuant to 27 CCR §20230(a), inert waste 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.

The SCLF does not accept untreated medical waste, liquid waste, designated wastes (as defined by §13174 of the California Water Code), or hazardous wastes (as defined by Section 1004 of the Solid Waste Disposal Act). Measures are taken to prevent the accidental or illicit disposal of hazardous material at the landfill. The SCLF also does not accept radioactive wastes, as defined by the California Environmental Protection Agency (Cal/EPA).

- Designated waste- means either of the following:

  (a) Hazardous waste that has been granted a variance from hazardous waste management requirements pursuant to Section 25143 of the Health and Safety Code.

  (b) Nonhazardous waste that consists of, or contains, pollutants that, under ambient environmental conditions at a waste management unit, could be released in concentrations exceeding applicable water quality objectives or that could reasonably be expected to affect

[1] Putrescible waste is waste material with high moisture content and a sufficient ratio of carbon to nitrogen to allow the anaerobic bacteria to convert it biologically.

beneficial uses of the waters of the state as contained in the appropriate state water quality control plan.

- The term ‘‘hazardous waste’’ means a solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may-

  (a) cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or

  (b) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed.

- Radioactive waste means:

  Any waste that emits energy as rays, waves, streams or energetic particles. Radioactive materials are often mixed with hazardous waste from nuclear reactors, research institutions, or hospitals.

Wastes that require special handling include damaged goods or legally seized material requiring immediate disposal in the presence of insurance or U.S. Customs Officials. Disposal of certain manufactured material and edible products in the presence of health officials also requires special waste handling. Typically, such wastes are placed in a cavity at the base of the working face and covered immediately. Current Waste Discharge Requirements (WDRs) allow incinerator ash disposal provided the ash does not contain hazardous waste constituents or soluble pollutants at concentrations in excess of applicable water quality objectives.

3.3.6 RESOURCE RECOVERY OPERATIONS

Certain loads delivered to the landfill consist of segregated materials, such as green waste, soil, and white goods, which are suitable for recovery and/or reuse on site. Loads containing these materials are diverted to specific unloading locations. A site employee is stationed at each unloading location to ensure that diverted loads contain clean material and are unloaded appropriately. Scavenging is not permitted by customers or employees. The following are types of recoverable resources and their application at the SCLF.

3.3.6.1 Green Waste

Incoming green waste loads (e.g. tree trimmings, leaves, and lawn cuttings) are directed to the green waste processing area and inspected for litter contamination as they are unloaded. Contaminated loads are disposed in the normal landfilling operation as refuse. Clean green waste material is shredded using a grinder and applied as alternative daily cover to the sloped portion of the daily refuse cell with the use of a scraper and/or bulldozer. This use of green waste is beneficial because it preserves landfill capacity (since the shredded green waste take the place of soil cover), and conserves soil that would otherwise be used for daily cover.

Green waste that is not needed on site is hauled off site by a contractor for beneficial use elsewhere. Generally, green waste material is processed and either used on site or hauled off site within two to three days of receipt. Exceptions to this occur over holiday weekends and inclement weather. At such times, the material is managed to prevent it from composting or becoming odorous.

3.3.6.2 Soil

The SCLF accepts imported soil for on site uses such as daily cover and road building. Soil loads are inspected for contamination using overhead mirrors or by an overhead inspector and/or hazardous waste inspector near the scales facility. Imported soil and excess dirt from site excavations are stored until needed at several on site stockpile locations.

3.3.6.3 Asphalt

Loads containing clean asphalt are directed to a specific area for unloading and stockpiling until needed in landfill operations such as haul road construction and creation of wet weather operating areas.

3.3.6.4 Tires

Tires are collected and temporarily stored at a designated area before being hauled off site for shredding followed by either recovery or disposal. Landfilling of unshredded tires is prohibited.

3.3.6.5 White Goods/Materials Recovery Program

A program to recover refrigerants and recycle refrigerators and air conditioners was initiated at the SCLF in July 1992 to comply with §608 of the Clean Air Act, which prohibits venting ozone-depleting compounds used as refrigerants into the environment in the course of disposing of air conditioning or refrigeration equipment. The refrigerant recovery program consists of the safe recovery and stockpiling of refrigerator and air conditioner units in a designated area. On January 1, 1994, this program was expanded to include the salvage of all recoverable large metallic items and appliances as required by Assembly Bill (AB) 1760. Recovered metallic items are periodically sold to a metal salvager.

The Sanitation Districts also utilize appropriately trained and equipped personnel to safely recover other materials when operationally, safely and economically feasible. Materials recovered may include ferrous and non-ferrous metals (such as pipes), plastics, textiles, glass, fiber, or wood. These materials are stored in roll-off bins or other containers as appropriate for the material, prior to transfer to off site recycling facilities. These recovered materials are removed from the site on a quarterly basis, or sooner if sufficient quantities have been collected for efficient transfer to a recycler or processer.

3.3.7 ENVIRONMENTAL CONTROLS

3.3.7.1 Liquids Management

The SCLF was developed and the extent of refuse placement was established prior to Subtitle D regulations requiring installation of a composite liner at the bottom of the landfill. Although the site does not have a composite liner, the existing natural liner of bedrock, the subsurface barrier at the mouth of the canyon, and the groundwater monitoring and extraction systems collectively provide an equivalent level of protection.

<u>Subsurface Barrier, Monitoring and Extraction Systems</u>

A subsurface barrier and collection system was installed at the western toe of the landfill (natural groundwater outlet of Scholl Canyon) to prevent groundwater flow in the canyon alluvium that lies above the bedrock. The subsurface barrier system consists of both “passive” and “active” components. The “passive” component consists of a cement/bentonite subsurface barrier that impedes the flow of

groundwater. The "active" component consists of six extraction wells located immediately upgradient of the barrier that automatically remove groundwater behind the barrier. Ten monitoring wells are installed downgradient of the barrier.

Liquids Treatment and Disposal

Groundwater removed from the extraction wells is discharged to sewers in accordance with the City's Industrial Waste Permit No. W–3835. Although capability exists to treat extracted water on site, the quality is high enough that the water can be discharged to the City sanitary sewer without treatment.

Seepage Control

Following periods of precipitation, intermittent seepage areas are occasionally encountered. When seepage areas are encountered, the water is collected if it occurs where it may encounter refuse, otherwise it is treated as surface run-off. When new seepage areas are encountered, they are reported to the Regional Water Quality Control Board (RWQCB) in quarterly technical reports. On the front face of the landfill, there have been two intermittent seepage areas which have been associated with rainfall percolation into the cover soil. To prevent this seepage from entering the storm drain on the front face and leaving the site, French seep drains have been installed to collect the seepage. The collected seepage is sewered pursuant to the industrial waste discharge permit. Details of the installation and construction of these drains were reported to the RWQCB pursuant to the WDR.

Seeps also occur when precipitation infiltrates through the native fractured or granitic material at the site. To eliminate the possibility of this type of seep encountering refuse upon landfilling, the Sanitation Districts construct a sump to collect the seepages at the cuts of concern. An example is Sump 2 located on the eastern edge of the main operating area. This sump is connected to a gravel-filled trench that crosses the canyon. An additional trench was also constructed along the main Scholl Canyon floor to collect and drain potential groundwater. All seepage water collected in this system is conveyed by gravity to Sump 2 for extraction.

3.3.7.2 Water Quality Monitoring Program

27 CCR requires the discharger of a waste management unit to conduct a water quality monitoring and response program approved by the RWQCB for the waste management unit. WDRs Order No. 01-132 and Monitoring and Reporting Program No. 2846, adopted by the RWQCB in 2001, specify the groundwater monitoring requirements for the SCLF. The program includes various requirements for groundwater monitoring, surface water monitoring, and industrial wastewater monitoring. Monitoring data are collected and reported to the RWQCB.

3.3.7.3 Landfill Gas Control and Monitoring

Landfill gas is primarily composed of methane, which is a powerful greenhouse gas as well as an effective replacement for natural gas as a power plant fuel. The SCLF has an extensive gas collection system that serves three purposes: (1) eliminating landfill gas emissions to neighboring properties, (2) limiting landfill gas emissions to the atmosphere and (3) providing fuel for energy production at the City's Grayson Power Plant. The SCLF gas collection system consists of horizontal and vertical collectors (trenches and wells), header lines, blowers, valves, condensate collection pipes and tanks, and a condensate treatment system. A gas compressor facility (shown in Figure 3-2) exists on site to provide some treatment of the landfill gas before being conveyed to the Grayson Power Plant via a long pipeline. Any gas not conveyed to the power plant is destroyed by combustion using the site's flare station.

Landfill gas monitoring programs at SCLF fulfill South Coast Air Quality Management District (SCAQMD) requirements as contained in its Rule 1150.1 for gaseous emissions from municipal solid waste landfills. Other programs include monitoring of landfill site structures for methane and monitoring landfill gas migration probes installed around the perimeter of the site. SCAQMD monitoring programs for off site landfill gas migration, ambient air quality, surface landfill gas emissions, landfill gas quality, and landfill gas combustion efficiency have been implemented at the SCLF since January 1989. Monitoring data are collected and reported to the regulating agencies, including SCAQMD.

As landfill gas is withdrawn from the landfill and cools to ambient temperature, water vapor condenses creating landfill gas condensate. The condensate drains by gravity to tanks at low points in the landfill. From these tanks, the condensate is conveyed to a packed-tower air stripper for treatment. The treated condensate is then discharged to the City's sanitary sewer system in accordance with Industrial Waste Permit No. W–2762.

3.3.7.4 Nuisance Control

A nuisance control program is employed at the SCLF to address any public concerns or complaints. During business hours, complaints can be phoned in to the site and a technician is dispatched to investigate and contact the complainant. After business hours, on weekends or holidays, the Sanitation Districts operate a 24-hour odor complaint "hotline." When a complaint is received, a landfill employee is promptly dispatched to investigate the problem. Upon completion of the investigation, the caller is notified. A complaint log is kept, and each complaint is documented in a monthly report to the LEA.

3.3.7.5 Fire Control

The landfill operation and ancillary facilities design are in compliance with the City's Fire Prevention Regulations. The SCLF is operated in a manner intended to reduce or eliminate fire hazards resulting from the landfill operation. A number of measures are used to contend with such issues. Employee smoking is prohibited in and near site facilities and buildings. Fire extinguishers are located at the SCLF field office, the flare station, and in various trailers. Additional fire extinguishers are mounted on all on site vehicles. In the event of a fire, dozers can be used to smother exposed fires with soil, and scrapers can be used to transport cover soil to the fire area. Alternatively, on site water vehicles are dispatched to the fire area to begin fire control and suppression. A large capacity water storage tank, two reclaimed water fill stands, and one fresh water fill stand are available on the project site to fill water trucks for firefighting purposes. Fire hydrants are provided at different locations around the perimeter of the project site, at the scales facility, and at the SCLF gas flare station in the southern portion of the project site. In the event of a fire that cannot be controlled by these measures, the local fire department is alerted.

3.3.7.6 Dust Control

The SCLF dust control program includes measures to reduce and control dust, and to discourage extremely dusty loads from entering the landfill. Throughout the working day, especially during dry or windy weather, the disposal area, excavation area, and active haul roads are sprayed with water to minimize dust. Permanent roads are paved to reduce dust production and are swept on a regular basis. Vegetation is allowed to grow in some areas to stabilize the topsoil. Additionally, a citation system has been implemented to control the disposal of dusty materials, and repeat violations result in denial of disposal privileges.

3.3.7.7 Vector Control

An integrated control strategy consisting of a limited working face area, refuse compaction, application of daily and intermediate cover, use of bird whistlers, use of suspended wires, planting of vegetation in completed areas, and prevention of ponding are used at the site to reduce the potential impacts of vectors. Seagulls, which are considered scavenger birds, are mainly controlled through the use of a control device that uses noise, called a bird whistler. The bird whistler emits a high frequency sound that is unpleasant to the birds but does not harm them in any way. A system of monofilament wires suspended above the operating area is also used that disrupts the seagulls' landing pattern, thus limiting access to the working face. Fly studies at landfills operated by the Sanitation Districts have demonstrated that, with proper operating procedures, conditions are not conducive to attracting and breeding flies or other insects. Similarly, rodent studies have shown that rodents do not survive the refuse compaction processes during collection or disposal with daily cover application. Therefore, rodents do not present a problem.

3.3.7.8 Drainage and Erosion Control

The purposes of the surface water drainage system are to convey run-off away from the landfill; divert potential run-on from entering the landfilled refuse; prevent inundation or washout of facilities and structures due to flooding or uncontrolled water movement; and protect receiving water quality by limiting erosion. SCLF has an extensive surface water drainage system that consists of drainage benches, down drain pipes, open channels, a desiltation and retention basin, additional silt capture structures, an energy dissipator and a box culvert. In accordance with 27 CCR, permanent drainage and sediment control structures are designed to convey the 100-year 24-hour storm event.

Operating decks are graded at two to three percent slope to promote run-off and avoid ponding. Run-off is conveyed to lower decks via down drain pipes. As landfilling proceeds, additional collection and conveyance facilities are extended to service each subsequent deck (or layer) of operation. Run-off from the front face also drains to the center drain pipe.

Benches intercept side slope run-off and limit the slope length, which in turn reduces flow velocities and reduces erosive force. Vegetation on side slopes limits erosion and holds soil in place. Benches are typically graded at two to three percent and drain to a down drain pipe. The eastern portion of the landfill drains to a basin on the north side of the landfill that is designed to capture silt and reduce peak storm flows. A silt fence weir structure captures additional silt before run-off enters the north down drain. The north and center down drains meet at an energy dissipator to reduce flow velocity and then discharge to a box culvert under Scholl Canyon Park, which then discharges into a debris basin operated by LADPW. This basin empties to the LADPW flood control system through a storm drain under Glen Oaks Boulevard.

A number of measures are employed to minimize exposure of refuse to rainfall and run-off including berms, tarps, pipes, minimizing the size of the refuse cell, and locating refuse cell areas away from flowlines.

The surface water drainage system is inspected and maintained as described in the current Stormwater Pollution Prevention Plan (SWPPP) developed to comply with the National Pollutant Discharge Elimination System (NPDES) permit for the SCLF. In particular, the desiltation/retention basin and its outflow channel are periodically inspected and typically cleared of vegetation and sedimentation once or twice a year, depending on the amount of rainfall. The SWPPP includes additional drainage control features such as sandbag check-dams, silt fences and straw bales for erosion and sediment control.

3.3.7.9 Litter Control

Sanitation Districts' employees monitor the landfill and access roads for litter and debris on a daily basis. Litter is controlled at the landfill working face by the daily application of cover material and the use of portable litter fences in the vicinity of the working area. The working area for landfill activities is also confined to as small an area as possible. All loads received are required to be covered. A surcharge is levied for uncovered loads arriving at the site with the potential to cause litter.

3.3.7.10 Noise Control

Activities associated with the SCLF that potentially generate off site noise impacts include disposal operations, green waste grinding, landfill traffic, operation of the flaring station and the landfill gas compression facility, and miscellaneous construction activities. Once the top of the landfill has reached the elevation of the nearby ridgeline and there is a line-of-sight to a sensitive receptor within a half-mile radius, a soil berm is installed along the edge of the operations deck adjacent to the ridgeline to supplement noise control provided by distance and natural topography. Prior to new lift construction, the berm is constructed 10 feet taller than the adjacent lift of waste to limit views of the disposal operation and attenuate operational noise levels. It should be noted that construction equipment and disposal operations are unshielded while the berm is being constructed. Berm construction takes approximately 2 to 3 weeks for a given area per lift. The time between lifts ranges from 9 to 72 months with an average of 36 months depending on the TPD received and lift acreage. Some areas next to the landfill look down onto the disposal operation (e.g., the golf course) and see and hear the disposal operations and associated landfill equipment, despite the berms. When the elevation of the landfill reaches the elevation of such an area, this exposure would decrease due to use of a berm. To varying extents, these berms also restrict visibility of the disposal operations. All site equipment and construction equipment are equipped with appropriate equipment for noise suppression.

3.3.7.11 Odor Control

A number of measures are utilized to control odors at the SCLF. Excessively odorous wastes are rejected from the site prior to unloading. Odorous loads are immediately covered by other waste. Development of odors in placed waste is avoided by covering the waste daily. Deodorizing agents may also be applied.

Landfill gas consisting primarily of methane, nitrogen and carbon dioxide is produced by decomposition of the buried refuse materials. Odors can result from the migration and subsequent escape of landfill gas into the atmosphere. As described above, an extensive landfill gas collection system has been installed to prevent gas migration to the atmosphere.

Additionally, the landfill cover soil removes odorous compounds in the landfill gas. Bacteria contained in the soil, as well as soil chemical processes, substantially reduce the trace organic components of the landfill gas, thereby reducing odors. When cracks occur in the cover soil due to settlement, the cover soil is recompacted to prevent direct venting.

3.3.7.12 Hazardous Waste Screening Program

In accordance with the landfill's Class III designation, only acceptable wastes are allowed into the site. Signs are posted at the landfill's entrance that state "NO HAZARDOUS OR LIQUID WASTES ARE ACCEPTED". To prevent disposal of hazardous waste, an extensive waste checking program is operated in accordance with 40 CFR §258.20 and includes:

- Random inspection of incoming loads.
- Records of inspections.
- Training of facility personnel to recognize regulated hazardous waste.
- Notification of designated regulatory agencies if hazardous waste is discovered.

All vehicles entering the site are screened for radioactive materials using a gamma-scintillation counter as they pass through the weigh scales. This counter is capable of detecting the presence of very low levels of radioactive waste. When a load appears to contain radioactive materials, the LADPH is called to inspect the load. All identified radioactive materials are returned to the producer through a system that traces progress through a manifest form. The LADPH determines appropriate disciplinary action.

Overhead mirrors enable the scales personnel to visually inspect loads for hazardous waste. At the disposal area, a trained hazardous waste inspector continuously inspects the newly unloaded refuse for hazardous and other unacceptable wastes. A random load checking program to monitor for hazardous wastes is also conducted at the site. Each day, five loads at the landfill are randomly selected and examined in detail by a trained inspector.

If hazardous waste is identified after a vehicle is unloaded, the waste is taken to a secure storage area on the landfill, packaged in accordance with regulatory requirements, and stored no more than 90 days in accordance with 22 CCR. If the material can be safely removed and repackaged for transport, the loads are transferred by licensed haulers to an appropriate hazardous waste disposal site. The LEA, Cal/EPA, RWQCB, California Highway Patrol, and Los Angeles County District Attorney's Office are notified of any such incidents. If regulatory agencies determine that the waste cannot be safely removed without danger to employees or the general public, the waste is carefully buried. The absorptive capacity of the refuse in the landfill is more than adequate to sequester the small incidental quantities of hazardous materials that have to be buried infrequently under such circumstances. If a load of concealed hazardous waste is identified, the hauler's disposal privileges are reviewed and, if appropriate, revoked.

3.3.8 TRAFFIC CONTROL

3.3.8.1 Surrounding Street System

Roadways that provide primary access to the site include Scholl Canyon Road, North Figueroa Street, and the SR-134:

- Scholl Canyon Road: Scholl Canyon Road is a 2-lane undivided street that provides the only public access into and out of the SCLF. Scholl Canyon Road begins at the northern terminus of Figueroa Street.
- North Figueroa Street: North Figueroa Street is a 4-lane undivided arterial that provides the only access to Scholl Canyon Road.
- Ventura Freeway: SR-134 is an east to west freeway that extends from Pasadena to North Hollywood and has eastbound and westbound exits to Figueroa Street. Near the project site, the freeway has eight lanes.

3.3.8.2 On Site Traffic Control

Near the scales facility, the road widens so that entering traffic may go to one of four weigh scales. During peak traffic periods, vehicles queue along the approach to the scales facility. Beyond the scales facility, traffic uses one of two roads to access the operating area. Site traffic is directed by signs or by a

flagman. After unloading, vehicles are directed to Scholl Canyon Road via the site exit near the scales facility.

3.3.9 SITE SECURITY

Site security is provided by chain link fencing on portions of the perimeter, topographical constraints, a locking gate at the entrance, and locked gates on the fire roads. The eastern terminus of Glen Oaks Boulevard is fenced, gated, and locked just east of the entrance to the Golf and Tennis Complex. During non-operating hours, the site is patrolled by a part-time private guard service. In addition, site buildings are equipped with alarm systems.

ATTACHMENT 5

3.0 PROJECT DESCRIPTION

The Repowering Project is a power plant repowering project that removes 238 megawatts (MW) gross (219 MW net) of existing old, inefficient, inflexible, and unreliable generation equipment that is past the end of its useful life, and replaces it with approximately 270 MW gross (262 MW net), state-of-the-art, efficient equipment that better fits the requirements and needs of the City. The Project is located within an industrial area of the City of Glendale, at 800 Air Way, Glendale, California 91201, just northeast of the Interstate 5 and Highway 134 interchange (Figures 2-1 and 2-2).

The Project would be comprised of four natural-gas-fired electrical generating units, totaling approximately 262 MW net (at average annual site ambient conditions) and ancillary buildings and equipment to replace Units 1, 2, 3, 4, 5, 8A, and 8BC, at the City's existing Grayson Power Plant within the City. An existing 48 MW (net) simple-cycle peaking unit (Unit 9) would not be removed, and would continue to operate during construction of the Repowering Project, and then be integrated into the overall Grayson Power Plant when the Project is completed. Simple-cycle units, discussed further in Section 3.1.5, consist of a gas turbine connected to an electric power generator. They are advantageous due to their operational flexibility and can be turned on quickly to provide peak load. The current total generating capacity at the Grayson Power Plant is 286 MW gross (267MW net). The Project would result in a Grayson Power Plant net generation capacity of 310 MW.

Landfill gas generated at Scholl Canyon is currently being combusted in Grayson's Units 3, 4, and 5 boilers. This landfill gas would no longer be transported to Grayson, and the pipeline would be decommissioned as part of the City's proposed Biogas Renewable Generation Project at Scholl Canyon. Instead, landfill gas is proposed to be used to generate electricity at Scholl Canyon in a proposed 12 MW Biogas Renewable Generation Project or it would be flared off.

The Repowering Project would consist of two independently operating simple-cycle natural-gas–fired combustion turbine power blocks, and two independently operating, one-on-one, combined-cycle natural-gas fired power blocks. Combined cycle units, discussed further in Section 3.1.6, utilize a combustion turbine generator to generate electricity while the waste heat from the combustion turbine is used to produce steam to generate additional electricity via a steam turbine.

Each of the simple-cycle power blocks would consist of a Siemens SGT-A65 TR (Industrial Trent60) natural-gas-fired combustion turbine generator, emission control system, and ancillary equipment. Each would generate approximately 60 MW net at average annual site conditions. Each of the combined-cycle power blocks would consist of one Siemens SGT-800 natural-gas-fired combustion turbine generator, a NEM manufactured heat recovery steam generator, one Siemens SST-400 steam turbine generator, a recycled water cooled steam condenser, and

related ancillary equipment that would generate approximately 71 MW net of generation at average annual site conditions.

Other equipment and facilities to be constructed and shared by the four power blocks include six natural gas compressors, a gas pressure control and metering station, two cooling towers, water treatment facilities, fire protection and emergency services, generator step-up transformers, other electrical switchgear and axillary transformers, a steam turbine generator building, and an operations and maintenance building. The Project would be constructed on approximately ten acres entirely within the footprint of the existing Grayson Power Plant and located within the City of Glendale's Utility Operations Center.

Project construction would require the demolition and removal of the existing Grayson Power Plant Units 1, 2, 3, 4, 5, 8A, and 8BC, their ancillary facilities, and the maintenance and operation buildings (Figure 2-3). Demolition and removal work is expected to take nine (9) months, and is scheduled to occur between the second quarter of 2018, and first quarter of 2019. Construction of the Project, which is depicted on Figure 2-4, is estimated to start after demolition is completed in the first quarter of 2019, and take approximately two (2) years with an additional six (6) months required for start-up and commissioning. Construction of the Project is expected to conclude by the fourth quarter of 2020, with commercial operation of the Project by the end of the second quarter of 2021.

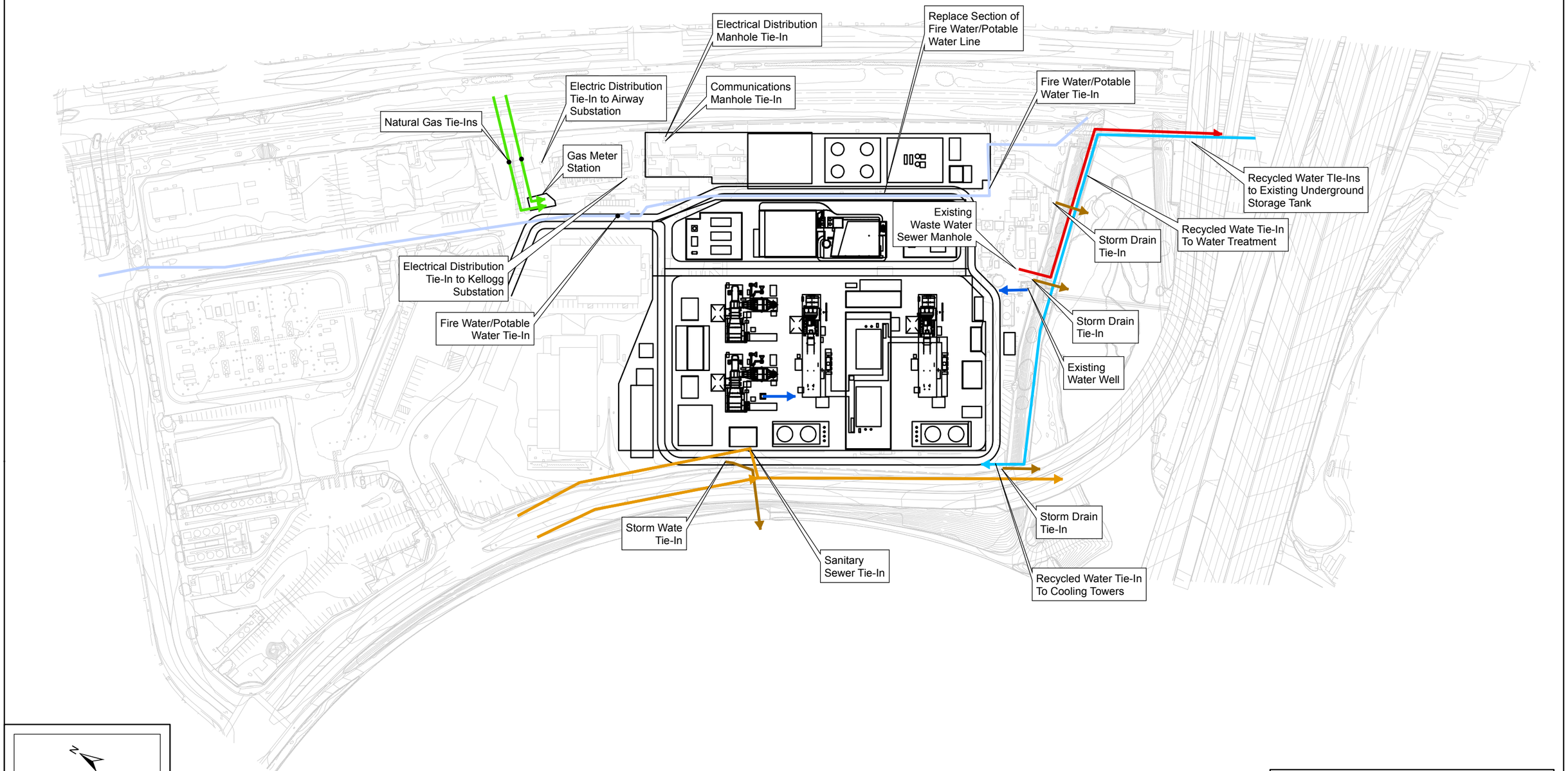
The Project would reuse existing off-site Linear Facilities, such as, natural gas, potable water, recycled water, stormwater discharge, processed wastewater discharge, and sanitary sewer pipelines, and electrical transmission lines that are currently serving the existing facilities. All interconnections from the Project are located entirely within the footprint of the existing City Utility Operations Center property boundaries (Figure 3-1). No off-site infrastructure development is necessary as part of the Project.

The project would use recycled water for all plant operations except domestic use and would reduce the use of potable water provided by the City at the Grayson Power Plant. Potable water would, after completion of the Project, only be used for domestic use, eye wash stations, and fire protection. Although potable water would be used during construction, it would no longer be used for equipment cooling or process water purposes as a part of normal operation, eliminating the use of potable water currently being used for Unit 9 and any potable water used for the units that would be demolished.

Wastewater, cooling tower blowdown and other process waste generated by the Project and Unit 9 would be treated as required and discharged into the existing sanitary sewer connection. This discharge would be conveyed back to the Los Angeles-Glendale Water Reclamation Plant, where it would be processed and again recycled to be made available for use at the Project site or at other facilities as recycled water for beneficial use. HRSG blowdown water would be recycled by sending it to the cooling towers and used as makeup water to reduce the Project's water needs.

On-site stormwater runoff within the Project site would flow via surface sheet flow and localized gutters to catch basins and to on-site storm drain piping. The storm drain piping would be connected to an on-site collection and pretreatment and infiltration system to allow for infiltration for the design storm event as required by state and local agencies for treatment as further described below. During storm events, larger than the design storm, overflow runoff exceeding the capacity of the infiltration system would be discharged into the adjacent Verdugo Wash and Los Angeles River through existing stormwater outfalls. Stormwater that falls within process equipment containment areas would be collected separately from typical site runoff, treated, and discharged into the existing public sanitary sewer system as further described below. Preliminary grading and drainage plans for the Project are included in Appendix H, Hydrology, and Water Quality Technical Reports.

Underground 69-kilovolt (kV) electrical interconnections would connect all four new units to the existing Kellogg Switchyard, which is located in the northeast corner of the Project and entirely within the footprint of the existing City Utility Operations Center property boundaries (Figure 3-1).. The only electrical interconnections from the Project will be at the existing Kellogg Switchyard. From the existing Kellogg Switchyard, power generated by the Project would interconnect to the GWP's existing distribution system serving the City's electric load.



N

0 100 200
Feet
0 25 50
Meters

- Existing Firewater/Potable Water to Site
- Existing Natural Gas to Site
- Existing Recycled Water to Site
- Existing Sanitary Sewer from Site
- Existing Storm Drain from Site
- Existing Waster Water Sewer from Site
- Existing Well Water to Site

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CITY OF GLENDALE
DEPARTMENT OF WATER AND POWER
PROPOSED GRAYSON REPOWERING PROJECT
ENVIRONMENTAL IMPACT REPORT
UTILITY CONNECTIONS

Date: 7/7/2017
Prepared by: HS

FIGURE NO. 3-1

The existing facilities at the Grayson Power Plant and those that would be present after implementation of the Project are summarized below in Table 3-1.

Table 3-1 Existing and Proposed Grayson Power Plant Facilities

Facility/Component	Existing Grayson Power Plant[1]	Proposed Grayson Repowering Project[1]
Gas Fired Boiler	5[2]	None
Steam Turbine Generator	5	2
Combustion Turbine Generator	3	5
Heat Recovery Steam Generator (HRSG)	2	2
Natural Gas Fuel Compressor	2	8
Exhaust Stack	8	5
Cooling Tower	5	2
Continuous Emissions Monitoring System	8	5
Water Treatment Facility	1	1
Ammonia Storage Tank	2	2
Water Storage Tank	3	5
Electrical Switchyard	2	1
Steam Turbine Building	None	1
Boiler Building	1[3]	None
Maintenance Building	None	1
Plant Operations Building	1	1
Ancillary Building	3	None
Water Lab	None	2
Generation Capacity (MW)	286	310

Notes:
1. includes Unit 9
2. Two existing boilers have been decommissioned but are still on site
3. Existing boiler building also houses the existing control rooms and plant personnel offices

3.1 PROJECT OVERVIEW AND DESIGN

The current Grayson Power Plant consists of eight generating units and associated plant equipment and structures. Units 1 through 5 boiler equipment is housed in a building that is approximately 275 feet long and varies from approximately 30 to 80-foot high, with exhaust stacks that are approximately 40 to 90 feet tall. In addition to Units 1 through 5, there are two units (Units 8A and 8BC), which are combined-cycle units each with their own 80-foot tall exhaust stack. Five cooling tower structures, varying from four towers to eight towers, also exist. These structures are approximately 40 feet tall. Unit 9, a GE LM6000 simple-cycle unit, would remain in operation.

Existing generation facilities (with exception of Unit 9) would be replaced with a combination of combined-cycle and simple-cycle gas turbine generation units. The equipment layout for the site is depicted on Figure 2-4 and shows the proposed location of the plant's major equipment including associated infrastructure and plant operations and buildings. The Project would

demolish Units 1 through 5, 8A, and 8BC, the five cooling towers, and other Project ancillary facilities. New construction would include a two-story plant operations building, approximately 25-foot tall by 220-foot long by 85-foot wide, as well as a steam turbine generator building approximately 50-foot tall, 233-foot long and 80-foot wide. The new exhaust stacks would range from approximately 100-foot tall for the simple-cycle units to 120-foot tall for the combined-cycle units. Two cooling towers, one for each combined cycle unit, would replace the five existing cooling towers.

The Project would be designed using commercially proven technology equipped with stringent environmental protection, monitoring, and safety systems to provide safe and reliable operation over a 30-year operating life. The Project's combustion turbines and associated equipment would feature the use of South Coast Air Quality Management District (SCAQMD) approved best available control technology to meet air pollution emission standards.

The repowered Grayson Power Plant would include the following generation units totaling 310 MW net at average annual site conditions:

- Two Siemens SGT-A65-TR (Industrial Trent60) simple cycle Combustion Turbine Generator units producing approximately 60 MW net at average annual site conditions;
- Two Siemens combined cycle units each with a Siemens SGT-800 combustion turbine generator and a Siemens SST-400 condensing steam turbine generator in combination producing approximately 71 MW net at average annual site conditions;
- One nominal 48 MW net simple cycle combustion turbine generator, the existing retained Unit 9, and not a part of the Project.

Additional engineering information regarding the Project is provided below:

1) The simple-cycle Siemens SGT-A65-TR (Industrial Trent60) combustion turbine generator would be equipped with an Inlet Spray Inter-cooling system to provide inlet air fogging and wet compression for power augmentation, and a Wet Low Emissions water injection combustion system for NOx control. The generator and lube oil systems would be air cooled in order to reduce water consumption.

2) The combined-cycle Siemens SGT-800 combustion turbine generators would be equipped with an evaporative inlet air cooling system using recycled water and would include Dry Low Emissions combustion system for NOx control. The generator and lube oil systems would be cooled using a closed loop cooling water system.

3) Each of the two combined-cycled units would include a horizontal gas flow two-pressure natural-circulation heat recovery steam generator. Each heat recovery steam generator would include an emission control system featuring SCAQMD approved best available control technology and would be equipped with a selective catalytic reduction system to reduce the NOx emissions and an oxidation catalyst to reduce CO and VOC emissions.

4) Each of the heat recovery steam generators would generate steam using the waste heat from the Siemens SGT-800 combustion turbine generator. The generated steam is then used to generate electricity in a dedicated single Steam Turbine Generator, each with its own water-cooled steam condenser. The condenser in turn is cooled by a wet two cooling tower using recycled water.

5) A steam turbine building to house the two steam turbine generator units with their corresponding condenser and pumps to minimize noise.

6) The simple-cycle units would each include an emission control system featuring SCAQMD approved best available control technology consisting of selective catalytic reduction system for the control of NOx emissions and an oxidation catalyst to control CO and VOC emissions.

7) Simple-cycle units would feature fast starting (from off to full load in ten minutes or less), and fast ramping up and down to support spinning and non-spin reserve as well as integration of renewable resources.

8) Simple-cycle units would be furnished with features that facilitate emergency start of the generation equipment without off-site power. However, Unit 9 would be the primary unit used for emergency start-up of the plant in the event of a total loss of power due to a major emergency event.

9) A water treatment system to treat and demineralize the recycled water would be used in the heat recovery steam generator for condensate make up, for the Siemens SGT-A65-TR (Industrial Trent60) system for power augmentation and for NOx reduction, and in other processes.

10) A plant operations building and a plant maintenance building would house the control room, maintenance shops, warehouse, and offices.

11) All interconnections to the City's electrical grid would occur on-site and no new off-site electrical transmission line modification or construction would be necessary for the Project (Figure 3-1).

12) The Project would be designed, constructed, and inspected in accordance with the current California Building Standards Code, also known as Title 24, California Code of Regulations, which encompasses the California Building Code, California Administrative Code, California Electrical Code, California Mechanical Code, California Plumbing Code, California Energy Code, California Fire Code, California Code for Building Conservation, California Reference Standards Code, and all other applicable laws, ordinances, regulations, and standards (LORS) in effect at the time initial design plans are submitted to the City for review and approval.

13) The Project would designate a respective certified engineer or geologist to monitor the construction progress requiring design review and approval by the City to ensure compliance with LORS and provide certified third party inspection to ensure that any work requiring such inspection is constructed in accordance with LORS, including excavation and backfill work and the installation of piles.

14) Structural support would be in accordance with the recommendation provided in Section 8.0 of the Geotechnical Investigation Report dated December 10, 2015, prepared by Stantec Consulting Services Inc., or as may be updated by the Engineer-Procurement-Construction Contractor. Deep foundations for power plant structures would be driven pre-stressed piles approximately 50 feet long.

3.1.1 Site Location

The Project site encompasses approximately ten acres within the City's Utility Operations Center (Figure 2-2). In addition, the Project would utilize space within the Utility Operations Center and underneath adjacent Highway 134 partially owned by the City and partially leased by the City from the State Caltrans division to provide construction parking, and an approximate two-acre off-site construction laydown area located north of the Project site at 1625 Flower Street adjacent to the Griffith Manor Park and owned by Disney (Figure 3-2). The Project site is located within an industrial area of the City, at 800 Air Way, Glendale, California 91201, just northeast of the Interstate 5 freeway and Hwy 134 interchange. The site is bounded to the west by Fairmont Avenue (adjacent and parallel to the Los Angeles River and Interstate 5 freeway); to the south by the Verdugo Wash (adjacent and parallel to the Fairmont Bridge and the CA 134 freeway); to the east by the Union Pacific Railway, San Fernando Road, commercial development, and then residential homes; and to the north by the balance of the Utility Operations Center and commercial properties north of Flower Street.

The existing site is predominantly paved (concrete and asphalt) around existing electrical generating equipment and ancillary buildings and equipment to support the generation of electricity for the City. The site topography is relatively flat with a slight slope to the north and west. The elevation is approximately 465 feet above mean sea level.

Primary access to the Project site would be provided via the main existing entrance off Fairmont Avenue. In addition, there is a secondary metal gate directly into the Grayson Power Plant site from Fairmont Avenue that would be used for truck hauling of demolition debris and truck delivery of equipment and material. The primary freeway access is the San Fernando Road exit from CA-134 or from the Western exit on Interstate 5.



STANTEC CONSULTING SERVICES Inc. 5500 Ming Avenue, Suite 300 Bakersfield, California 93309 Phone: (661) 617-5873 Fax: (661) 396-3771	**CITY OF GLENDALE** **DEPARTMENT OF WATER AND POWER** **PROPOSED GRAYSON REPOWERING PROJECT** **ENVIRONMENTAL IMPACT REPORT** **PROJECT SITE AND EQUIPMENT LAYDOWN AREAS**	Date: 7/7/2017 Prepared by: HS **FIGURE NO. 3-2**

3.1.2 Site Demolition

The Grayson Power Plant currently has eight operating generating units (Units 1, 2, 3, 4, 5, 8A, 8BC, and 9) and ancillary facilities that, with the exception of Unit 9, must be removed prior to the construction of the new facilities. Units 1 through 5 were built between 1941 and 1964, Units 8A and 8BC were completed in 1977, and Unit 9 was built in 2003. Units 1 through 5, 8A and 8BC along with the existing cooling towers, buildings, and all ancillary systems including foundations and underground utilities not associated with Unit 9 or required as part of the repowered facility would be demolished and removed. Unit 9 would remain in operation during the demolition and construction phases and would be integrated into the Project facilities.

In addition, the existing 8-inch landfill gas pipeline running from Scholl Canyon Landfill to the Grayson Power Plant would be capped at the Scholl Canyon Landfill property line and decommissioning is proposed as part of the proposed Biogas Renewable Generation Project located at the Scholl Canyon Landfill.

The existing water treatment facilities would be temporarily relocated and replaced with portable facilities to support Unit 9 operation during demolition and Project construction. The existing domestic water system would be temporarily modified to provide fire protection during demolition and construction. Demolition activities are discussed further in Section 3.2.

3.1.3 Electrical, Natural Gas, Water, and Sewer Interconnections

3.1.3.1 Electrical Connections

This section discusses electrical, natural gas, water, sewer and stormwater discharge connections necessary for the Project. Water supply and use are discussed in Section 3.1.11.

The Project would interconnect to the existing 69-kV Kellogg Switchyard on the north-east corner of the site. Connection to the Switchyard would be via new underground ductbanks within the boundaries of the Utility Operations Center site. From the switchyard, power generated by the Project would flow to the GWP electric distribution system via existing underground lines. The Kellogg Switchyard is also connected to the existing Air Way Substation that interconnects Glendale to the Los Angeles Water and Power transmission system and to the Magnolia Power Plant in Burbank.

3.1.3.2 Natural Gas Supply Pipeline Connection

The combustion turbine generators would be designed to only burn pipeline-quality natural gas. The maximum natural gas fuel consumption for the Project, including Unit 9, during full load operations would be approximately 60 million cubic feet per day.

Natural gas is currently delivered to the existing Grayson Power Plant at an approximately 250 pounds per square-inch gauge via three separate Southern California Gas Company

(SoCalGas) meters. SoCalGas would replace two of the existing metering stations with a new metering station that would provide natural gas to the Project at up to 550 pounds per square inch gauge (psig) as well as serving Unit 9 and the entire Utility Operations Center. The new metering station would be located within the Utility Operations Center site and no new off-site construction would be required. An existing meter station currently serving Unit 8A and Unit 8BC would be temporarily modified to serve Unit 9 and allow the existing Unit 9 to remain in service during the demolition and construction of the Project.

The natural gas pressure delivered to the repowered plant by SoCalGas would fluctuate between 250 and 550 pounds per square inch gauge (psig) based on demands for natural gas by SoCalGas customers. The existing six-inch and eight-inch diameter gas pipelines that are owned, operated, and maintained by SoCalGas and currently serve the existing Grayson Power Plant and the Utility Operations Center would serve the new metering station. Both the existing six-inch and eight-inch pipelines are encased in a 10-inch and 12-inch sleeve under the railroad tracks and would not require new construction under the railroad tracks or new off-site construction.

The natural gas would flow from the new SoCalGas metering station to the Project's two compressor stations that would be constructed by the City as part of the Project and to the existing Unit 9 gas compressors. Two new gas compressors stations, each consisting of three gas compressors, with each compressor sized to serve one combustion turbine (one spare for reliability), would be constructed as part of the Project. One station would provide the required gas flow and pressure via an underground pipe for the simple-cycle units, and the other would provide the required gas flow and pressure via a separate underground pipe for the combined-cycle units. Each compressor would be designed to provide the required flow and pressure required by the respective simple-cycle or combined-cycle unit at 100 percent load capacity. From the gas compressor stations, the natural gas would flow to the combustion turbine generators via underground piping. A new pressure reducing station located near the new metering station would be installed to supply low pressure gas to domestic building systems such as water heaters and space heaters.

3.1.3.3 Recycled Water Supply Pipeline Connection

Recycled water is delivered to the existing Grayson Power Plant via an existing 16-inch-diameter pipeline owned by the City. The recycled water pipeline enters the existing Grayson Power Plant from the southern boundary of the site via the existing foot bridge across the Verdugo Wash from a location adjacent to an existing 2.5-million-gallon underground storage tank that would become the Project's recycled water storage tank. The existing GWP 16-inch recycled water pipeline would be connected to the existing City 2.5-million-gallon underground storage tank via a new connection from the pipeline to the tank. The existing underground storage tank would provide the necessary storage of recycled water to meet the needs of the Project during times of low flows or no flow from the reclamation plant. The Project would use recycled water for all

process and cooling water requirements. Recycled water would not be used where human contact with the water is likely such as for domestic and fire protection services.

The main use for recycled water includes boiler water, cooling tower water, turbine power enhancement and cleaning and NOx control for the simple cycle units. Recycled water would also be used for Unit 9 in place of potable water currently being used. Refer to Section 3.1.11.2, Recycled Water Supply, for a discussion of use.

3.1.3.4 Potable Water Supply Pipeline Connection

Potable water is supplied to the existing Grayson Power Plant site by GWP via an existing 8-inch pipeline under Air Way near the northeast corner of the Project site and a 12-inch pipeline from San Fernando Road at the southeast corner of the Project site. No new off-site potable water supply pipelines would be required for the Project and no off-site construction is anticipated. Figure 3-1 shows the location of the domestic water lines. At the start of demolition, the existing potable water system would be temporarily modified to provide fire protection water and Unit 9 use during demolition and construction.

A permanent domestic and fire water distribution system connected to the existing connections to the City's potable water system would be constructed to provide the Project's potable water and fire protection water needs.

The Project would only use potable water for uses where the water use may come into contact with people. Potable water would be used in demolition and construction dust control, for drinking water, sanitation, and fire protection. Potable water use for the Project would be less than the existing facility requires because all process and cooling water used by the repowered facility would now come from recycled water sources.

3.1.3.5 Sanitary Sewer Pipeline Connection

Presently there are two existing connections to the City's sanitary sewer system from the Grayson Power Plant. One is located on the west side of the site and connects to a 24-inch sewer main located in Fairmont Avenue. The second connection is an existing 10-inch line located along the southerly boundary of the site which crosses the Verdugo Wash via the existing foot bridge and connects to a the 30- to 36-inch sewer main located southerly of the site (Figure 3-1).

Sanitary wastes from rest rooms, showers, kitchen facilities, etc., would be collected from throughout the Project and be piped via a new underground pipeline directly to an existing sanitary sewer manhole located on the west side of the Project site that connects to the 24-inch main in Fairmont Avenue. Process wastes such as plant drains, water treatment waste, and cooling tower blowdown would be collected separately from the sanitary waste and piped to an existing lift station located on the south portion of the site in the vicinity of Unit 9 that then connects to the 10-inch line located along the southerly boundary of the site that crosses the Verdugo Wash via the existing foot bridge and connects to the 30-36 sewer main. Discharge of

all process wastes and sanitary sewage to the GWP sanitary sewer would comply with the requirements of the existing sewer discharge permit. The discharged wastes would flow directly to the Los Angeles-Glendale Water Reclamation Plant for recycling.

The Project would connect to the sewer system through the existing sewer lines. No off-site modification of the existing sewer system would be required.

3.1.3.6 Stormwater Discharge Piping Connection

In the existing condition, stormwater that falls within the plant in pavement areas (excluding the process equipment containment areas) flows via surface sheet flow and localized gutters to catch basins and on-site storm drain piping. The storm drain piping then connects to existing outfalls into the Verdugo Wash to the south and Los Angeles River to the west of the site. Stormwater that falls within process equipment containment areas may have a higher chance of oil presence and is therefore contained and either left to evaporate or it is sampled first to determine the presence of oil or contaminants. If testing confirms no oil or contaminates are present, the stormwater is pumped out and allowed to flow to the on-site storm drain piping. If testing identifies oil or contaminates, the water is collected and shipped off-site to an approved disposal facility.

In the proposed condition, on-site stormwater runoff from the Project would flow via surface sheet flow and localized gutters to catch basins and on-site storm drain piping (Figure 3-1 and Appendix H Preliminary Grading and Drainage Plans). The storm drain piping would be connected to a new on-site collection and pretreatment and an infiltration system to allow for infiltration for the design storm event (see Section 3.1.13) as required by state and local agencies for treatment. During storm-events larger than the design storm, overflow runoff exceeding the capacity of the infiltration system would be discharged into the adjacent Verdugo Wash and Los Angeles River through existing stormwater outfalls. Stormwater that falls within process equipment containment areas would be contained and sampled to determine if oil or contaminates are present and if so, collected separately from typical site runoff, pumped to the oily water separator (see Section 3.1.14.2), treated and discharged into the existing public sanitary sewer system via the blow down lift station.

3.1.4 Process Description

The Project four generating units, or power blocks as they are referred to, would consist of the following equipment:

- Two each Siemens SGT-A65-TR (Industrial Trent60) nominal 60 MW net simple cycle generating units equipped with water injection to control combustion NOx, Inlet Spray Inter-cooling system for power augmentation; an emission control system consisting of Selective Catalyst Reduction system for exhaust gas NOx emissions

control, and oxidation catalyst equipment to control CO and VOC emission; continuous emissions monitoring system; and associated support equipment.

- Two each Siemens Combined Cycle SCC6-800 nominal 71 MW net generating units, each consisting of a Siemens SGT-800 combustion turbine generator equipped with dry low emission combustion system and evaporative cooling system to provide performance improvements; a Heat Recovery Steam Generator including selective catalytic reduction systems for exhaust gas NOx emissions control and oxidation catalyst equipment to control CO and VOC emissions; a Siemens SST-400 single casing, axial exhaust steam turbine generator; and associated support equipment. The condenser for the system would use recycled water for cooling by evaporative cooling in a cooling tower.

Each of the two Siemens SGT-A65-TR simple cycle combustion turbine generator power blocks major systems include self-cleaning air inlet high efficiency particulate air filtration; Inlet Spray Inter-cooling fogging and wet compression water injection system; axial flow compressor sections, water injected combustion system for NOx control, and power turbine system coupled to an alternating current air-cooled generator; exhaust gas emission control system, including selective catalytic reduction system for NOx reduction using 19 percent aqueous ammonia, oxidation catalyst for exhaust CO and VOC reduction; continuous emission monitoring system; and associated support equipment. Each simple cycle power block would produce approximately 60 MW net at average annual site conditions and is anticipated to have an annual availability of 94 percent. At an annual average Glendale temperature of 64° F dry bulb and 55° F wet bulb, each unit is expected to produce 62 MW gross at a heat rate of 9,350 British thermal units per kilowatt hour (Btu/kWH) on a higher heating value basis at 100 percent power load.

Each of the two Siemens SCC6-800 combined cycle power blocks include self-cleaning inlet air high efficiency particulate air filtration; inlet air evaporative cooling system using recycled water; axial flow gas compressor section, dry low emission combustor section and power turbine section coupled via a speed reduction gear to a generator; two pressure, horizontal design, heat recovery steam generators to utilize the hot turbine exhaust gases to produce high and low pressure superheated steam for the steam turbine; an emission control system, including a selective catalytic reduction system using 19 percent aqueous ammonia for NOx reduction and an oxidation catalyst to reduce exhaust CO and VOC; a continuous emission monitoring system; a condensing steam turbine coupled to a generator to convert the high and low pressure superheated steam to electricity; a condenser cooled by recycled water; and associated support equipment. Each combined cycle power block would produce approximately 71 MW net at average annual site conditions and is anticipated to have an annual availability of approximately 94 percent. Approximately 50 MW would be produced by the combustion turbine generator and 21 MW produced by the steam turbine generator. The heat balance for the combined cycle power block at an annual average Glendale temperature of 64° F dry bulb

and 55° F temperature wet bulb is expected to produce 73 MW gross at a heat rate of 7,000 Btu/kWH higher heating value at 100 percent power load.

Each of the four units would utilize SCAQMD-approved best available control technology to meet the permit conditions for the emissions of criteria pollutants and hazardous air pollutants. For the SGT-A65-TR (Industrial Trent60) simple cycle units, NOx would be controlled to 2.3 parts per million by volume, dry basis, corrected to 15 percent oxygen through the use of water injected combustors and selective catalyst reduction system. An oxidation catalyst would also be used to control CO emissions to the best available control technology limit of 2.0 parts per million by volume, dry basis corrected to 15 percent oxygen and VOCs emissions of 2.0 parts per million by volume, dry basis or less corrected to 15 percent oxygen. Best available control technology limits for particulate matter and sulfur dioxide content less than 0.75 grains per 100 cubic feet (gr/100 scf) would be achieved by exclusive use of pipeline quality natural gas as fuel for the combustion turbines and would be less than 3.3 lb/hr. The emissions of excess ammonia or ammonia slip (NH_3) not used in the selective catalytic reduction system would be limited to 5.0 parts per million, by volume, dry basis corrected to 15 percent oxygen.

For the SSGT-800 combined cycle units, NOx would be controlled to 2.0 parts per million by volume, dry basis, corrected to 15 percent oxygen through the use of dry low emissions combustors and the selective catalyst reduction system. An oxidation catalyst would also be used to control CO emissions to the best available control technology limit of 1.5 parts per million by volume, dry basis corrected to 15 percent oxygen and VOCs emissions of 2.0 parts per million by volume, dry basis or less corrected to 15 percent oxygen. Best available control technology limits for particulate matter and sulfur dioxide content less than 0.75 grains per 100 cubic feet (gr/100 scf) would be achieved by exclusive use of pipeline quality natural gas as fuel for the combustion turbines and would be less than 2.2 lb/hr. The emissions of excess ammonia or ammonia slip (NH_3) not used in the selective catalytic reduction system would be limited to 5.0 parts per million by volume, dry basis corrected to 15 percent oxygen.

3.1.5 Simple-Cycle Process

Combustion turbines in simple cycle configuration (Figure 3-3) utilize a single thermodynamic cycle called the Brayton cycle. In the Brayton cycle, the working fluid (e.g. air) is compressed, heated, expanded through a turbine to turn the shaft (rotor) and then be discharged. The shaft drives the generator to produce electricity and the compressor to provide a continuous source of compressed air to the combustor. The combustion turbine exhaust gas, at slightly above atmospheric pressure, flows through an emissions control system before discharging into the atmosphere. For this Project, the exhaust gas would be tempered to reduce the gas temperature to near 750 degrees Fahrenheit, the optimum temperature range for the selective catalytic reduction to work properly. The tempered gas would flow into the exhaust ducting where the emission control system consisting of oxidation catalyst and selective catalytic reduction are situated and would then be discharged from the stack after passing through the catalyst beds.

3.1.6 Combined-Cycle Process

A combined cycle (Figures 3-4a, b) process is so named because the arrangement uses two thermodynamic cycles to produce electricity. Like the simple cycle units, the combined cycle units also use combustion turbines based on the Brayton cycle. The second thermodynamic cycle is the Rankine cycle where a working fluid (water) is pressurized, heated into steam (vaporized), expanded through a steam turbine to turn the shaft, then condensed back into water and then pumped back into the steam generator to repeat the cycle. The shaft drives a generator to make electricity. Waste heat from the Brayton cycle is used as the heating source for the Ranking Cycle.

Combustion turbine generator inlet air (the turbine's working fluid) is drawn through the inlet air filter, inlet air cooler, and associated air inlet ductwork before being compressed by the combustion turbine generator compressor section. The hot compressed air flows into the combustion turbine generator combustion section. Burners in the combustion section combust natural gas fuel to further heat the incoming hot compressed air. The heated compressed air flows out of the combustor to the turbine expander section. The hot exhaust gas expands through the power turbine (expander) section of the combustion turbine generators, driving rotation of the shaft that generates electricity in the generator and the combustion turbine generator compressor producing compressed air to the combustor. The exhaust gas at slightly above atmospheric pressure is ducted into the heat recovery steam generator.

The hot combustion gases leaving the combustion turbine enter the heat recovery steam generator. The heat recovery steam generator uses a series of finned, metal tubes to draw heat out of the turbine exhaust gases producing high pressure and low pressure superheated steam. The cooled turbine exhaust is discharged from the heat recovery steam generator stack into the atmosphere. An emission control system consisting of catalyst embedded in the heat recovery steam generator gas flow path reduces NOx, CO and VOCs prior to release to the atmosphere.

The high and low-pressure steam from the heat recovery steam generator is routed to the steam turbine where it expands as it passes through the turbine giving up energy to drive the rotation of the steam turbine shaft. The steam exhausts from the steam turbine into the condenser which operates at vacuum. The condenser transfers heat from the turbine exhaust stream into the cooling water system, condensing the steam into water to be returned to the heat recovery steam generator where it would once again be converted to high pressure and low pressure superheated steam. The heat absorbed into the cooling water in the condenser is disbursed to the atmosphere through the cooling tower.

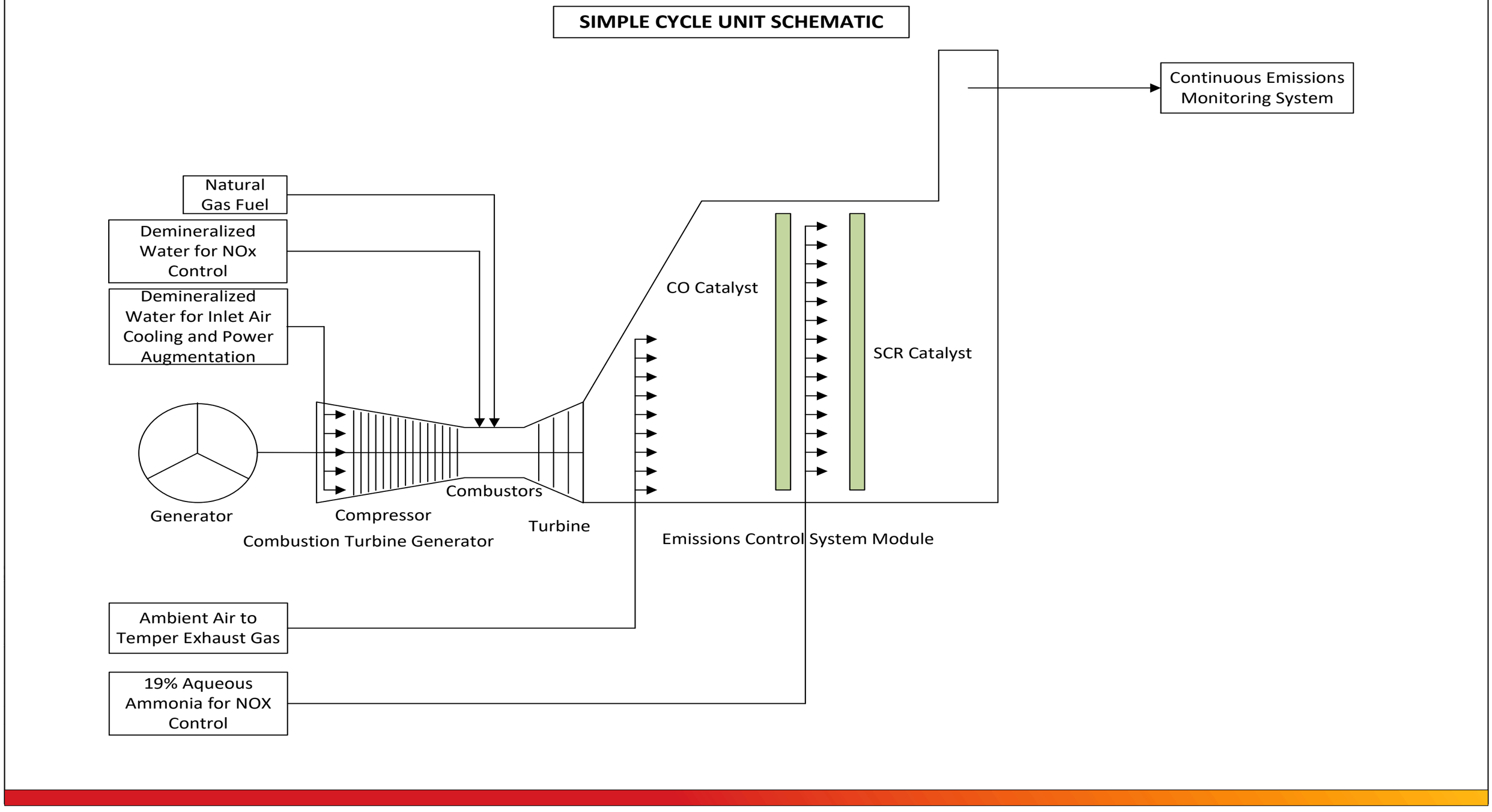


Figure 3-3
Simple Cycle Schematic

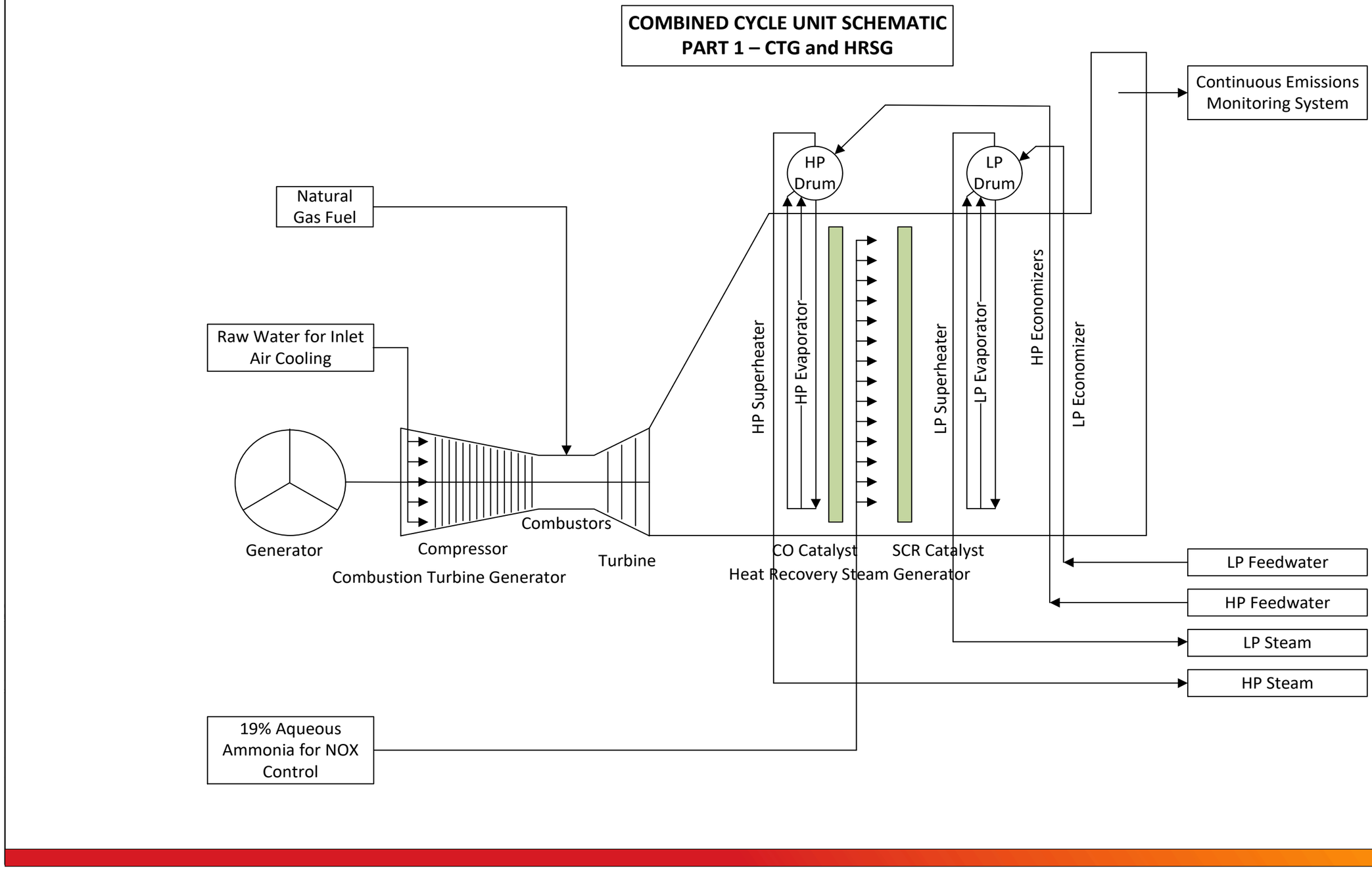


Figure 3-4a
Combined Cycle Schematic Part 1

COMBINED CYCLE UNIT SCHEMATIC
PART 2 – STG, Condenser & Cooling Tower

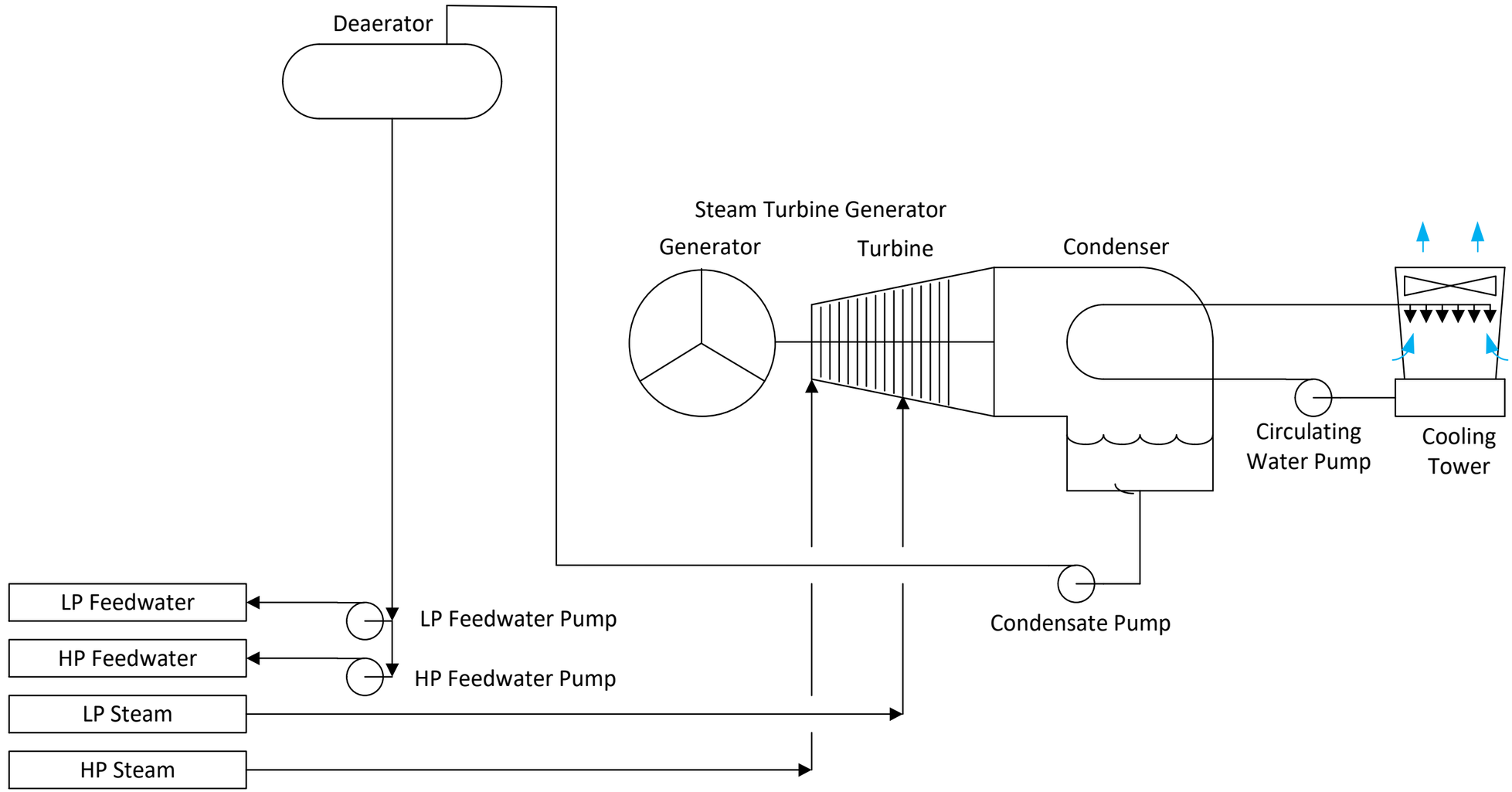


Figure 3-4b
Combined Cycle Schematic Part 2

3.1.7 Major Generating Facility Components

3.1.7.1 Combustion Turbine Generators

Each of the simple-cycle units and the combined-cycle units include a combustion turbine generator. The combustion turbine section converts the thermal energy of combusted natural gas into mechanical energy (shaft rotation), which is converted to electrical energy in the generator connected to the combustion turbine shaft.

A combustion turbine generator has four basic processes:

1) The first process is the compression of air which is the working fluid in a combustion turbine.

2) In the second process the hot compressed air is further heated by burning fuel in the combustor where the compressed air and fuel are mixed.

3) In the third process the very hot gas passes through the turbine section which uses the energy in the very hot high pressure exhaust gas to rotate the shaft that drives both the compressor and the generator. The turbine exhaust gas is discharged to the atmosphere slightly above atmospheric pressure.

4) The rotating shaft energy, in excess of that required to drive the gas turbine compressor, is converted into electrical energy by the generator.

Combustion turbine control and instrumentation system would include the turbine governing system, the protective system, and the sequence logic.

In the simple-cycle turbine generators, the exhaust gases flow into the emissions control section where the gases are cleaned up and are then discharged into the atmosphere. In the combined cycle turbine generators, the exhaust gases from the simple-cycle turbine portion are ducted into the heat recovery steam generator where its heat would be used to produce steam and then passes through an emission control system (SCR) where the gas is cleaned up to meet regulatory requirements.

Each combustion turbine generator system would include supporting systems and associated auxiliary equipment. The combustion turbine generators and some accessory equipment would be contained in an acoustical enclosure for noise reduction.

The type of generator supplied with the Siemens SGT-A65-TR simple cycle unit would be a direct air cooled type and the type of generator supplied with both the combustion turbine and the steam turbine for the combined cycle units would be a totally enclosed water-to-air cooled generator. The direct air cooled generator would use filtered atmospheric air to cool the generator coils and the totally enclosed water-to-air cooled generators would utilize a closed

loop cooling system using demineralized water and a corrosion inhibiter for cooling the generators. The closed loop cooling water would be cooled using recycled water from the cooling tower. The generator excitation systems would utilize brushless systems.

Combustion turbine generators would be equipped with the following systems and components:

- Inlet air filters, inlet silencers, and inlet air cooling using an evaporative cooler for the SGT-800 or fogging for the SGT-A65-TR
- Inlet Spray Intercooling power augmentation system for the SGT-A54-TR
- Metal turbine enclosure with a ventilation system
- Lubrication oil system for the combustion turbine and the generator bearings
- Hydraulic control oil system (may be part of the lube oil system)
- Oil coolers
- Combustion system, dry low emissions combustion (SGT-800) or water injected combustion system (SGT-A65-TR)
- Compressor wash system
- Fire detection and protection system (using carbon dioxide)
- Fuel gas system, including flow meter, heaters (SGT-800 only) and duplex filter
- Starter system
- Turbine controls
- Shaft rotating system (for starting and during cool down)
- Totally enclosed water-to-air cooled or direct air cooled generators
- Generator controls, protection, excitation, power system stabilizer, and automatic generation control

3.1.7.2 Emission Control Systems

Both simple cycle and combined cycle combustion turbine generating systems utilize emission control systems to reduce the exhaust of NOx, CO, and VOCs. For the simple cycle turbine generators, the emission control system is located downstream of the turbine exhaust duct and for the combined cycle turbine generators the emission control system is located within the heat recovery steam generator. The emission control systems produce similar results in both the simple cycle and combined˙ cycle turbines.

The emission control systems contain an oxidation module to reduce CO and VOCs and a selective catalytic reduction catalyst activated by ammonia injection to reduce NOx. The catalyst sections are located along the exhaust gas path where the exhaust gas temperature is optimal for the specific catalyst activity.

The ammonia injection system vaporizes 19 percent aqueous ammonia using a side stream of combustion turbine generator exhaust gas. The vaporized ammonia is injected into the exhaust gas streams upstream of the selective catalytic reduction catalyst to activate the catalyst. The selective catalytic reduction catalyzes the ammonia with NOx to produce inert nitrogen gas and water vapor.

After the emission reduction catalysts, the exhaust gas enters the stack at approximately 750°F for the simple cycle units and at approximately 200°F for the combined cycle units after having been further cooled from having produced steam. The stacks have a continuous emissions monitoring system which continuously samples the stack concentrations of controlled emissions to assure that the exhaust parameters remain within permitted parameters. The stacks will have silencers for noise abatement.

3.1.7.3 Heat Recovery Steam Generators

Each combined cycle unit would include a heat recovery steam generator that would transfer heat from the exhaust gas of the combustion turbine to the feed water to produce high and low pressure superheated steam at the pressures and temperatures required by the steam turbine. Each two-pressure heat recovery steam generator would be equipped with inlet and outlet ductwork, heat transfer coils, drums, an emission control system, insulation, and associated exhaust stack. The heat transfer coils include economizers, natural circulation evaporator sections, and superheaters, one of each for both the low and high pressure systems.

Major heat transfer components of each heat recovery steam generator would include the economizer (a heat exchanger that pre-heats the water), evaporator with steam drum (that produces saturated steam), and superheater (which further heats the steam), one of each for both the low and high pressure systems. The economizers receive feedwater from the deaerator via the boiler feedwater pumps. The economizer is the final heat transfer section to receive heat from the combustion gases before they are exhausted to the atmosphere through the stack. The stack is designed to disperse the exhaust gas so that there is no impact on downwind sensitive receptors.

The superheated high-pressure steam flows to the inlet of the steam turbine generator. Attemperators (a device that regulates the temperature of the steam) would be provided upstream and downstream of the high pressure super heater for control of the steam temperature entering the steam turbine generator. In addition, to increase output and efficiency, low pressure superheated steam is also supplied to the steam turbine generator.

The heat recovery steam generator includes ductwork, heat transfer sections, as well as startup vents, safety and relief valves, and continuous and intermittent blowdown drains.

3.1.7.4 Steam Turbine System

The two combined cycle units each include a single-casing and two pressure inlet condensing steam turbine with manual and automatic synchronization generator designed for indoor installation.

Steam from the heat recovery steam generator super heaters would enter the steam turbine through the inlet steam system. The steam would expand through the turbine blades, driving the generator. On exiting the turbine, the steam would flow into the recycled water cooled condenser. A full bypass around the steam turbine to condenser would be furnished so that venting of steam to atmosphere is only required in upset situations. When needed, steam is released to atmosphere through a steam vent valve and noise silencer.

3.1.7.5 Fuel Gas Compressors

The combustion turbine generators would be designed to only utilize natural gas as fuel. Natural gas would be delivered to the Project via a new metering station within the Utility Operations Center site to measure the amount of natural gas consumed at the entire Grayson Power Plant facility, including the existing Unit 9.

Current gas supply pressure to the existing Grayson Power Plant is limited to around 250 pounds per square inch gauge. By installing the new metering station, SoCalGas service gas supply pressure would range between 250- to 550-pounds per square inch gauge, reducing the required auxiliary load for the Project. Fuel gas compression is required to increase gas pressure up to 850 pounds per square inch gauge to allow the SGT-A65-TR combustion turbines to reliably operate at full load, and up to 470 pounds per square inch gauge to allow the SGT-800 combustion turbines to reliably operate at full load.

There would be two gas compressor areas constructed as part of the Project; one for the simple cycle units consisting of one 100 percent capacity compressor furnished per combustion turbine generator plus a 100 percent capacity spare; and one for the combined cycle units consisting of one 100 percent capacity compressor furnished per combined cycle combustion turbine generator plus a 100 percent capacity spare for a total of six compressors to serve the four new combustion turbine generators. The existing Unit 9 combustion turbine generator would continue to be fed from the existing gas compressors for that unit.

All six fuel gas compressors provided as part of the Project would be motor driven reciprocating type and would be surrounded by sound attenuation walls to control noise to ensure compliance with the City's noise ordinance.

3.1.8 Major Electrical Equipment and Systems

3.1.8.1 Alternating Current Power — Connection to the Electrical Grid

Power delivered to Glendale's system from LADWP transmission system from external renewable energy facilities and conventional external power facilities arrives via four existing 230-kV transmission lines that terminate at the Air Way Substation located at the Utility Operations Center. The three 230/69-kV transformers at Air Way Substation then deliver the power to the Kellogg Switchyard, also located at the Utility Operations Center.

Power delivered to Glendale's system from Burbank Water and Power's Magnolia Power Plant arrives via two existing 69-kV transmission lines that terminate at the Western Substation. An existing 69-kV transmission line from Western then delivers the power to the Kellogg Switchyard.

The Kellogg Switchyard is the nexus for the City's grid and distributes power to the City's distribution system via existing underground transmission lines. No new transmission lines outside the Project's boundaries are required as a result of the Project.

Power from the Project would be generated by the four combustion turbine generators and the two steam turbine generators at 13.8-kV. Each combustion and steam turbine generator would have a 13.8-kV generator circuit breaker, located on the generator output, to isolate and synchronize the combustion turbine generator to the grid during startup.

The combustion turbine and steam turbine generators for each combined cycle unit connect to a common generator step-up transformer. The combustion turbine for each simple cycle unit connects to its own generator step-up transformer. The four-mineral oil insulated, fan-cooled generator step-up transformers increase the voltage to 69-kV for connection to the City's electrical distribution grid at the Kellogg Switchyard. Surge arresters would be provided at the high-voltage bushings to protect the critical and major component from surges on the 69-kV system caused by lightning strikes or other system disturbances. The transformers would be set on concrete pads within berms designed to contain the transformer insulating fluid in the event of a leak or spill. Rated fire barriers would be used to separate critical equipment and to provide fire protection.

The generating units would be connected to the Kellogg Switchyard through existing Gas Insulated Switchgear breakers as does the existing Unit 9. Connection of the generating units to the Kellogg Switchyard would be via new underground 69-kV transmission lines. All interconnections to the switchyard would be within the City's Utility Operations Center site boundary. The Kellogg Switchyard has an existing relay house to house the protective relays and communication equipment. No external modifications to the relay house would be required.

3.1.8.2 Alternating Current Power—Distribution to Auxiliaries

Auxiliary power is required within the facility to power auxiliaries such as gas compressors, pumps and fans, cooling towers, control systems, and general facility loads including lighting, heating, and air conditioning. A station battery system would be used to provide direct current voltage as backup power for control systems and other critical uses.

Auxiliary power for a unit would be fed from the 13.8-kV output of each combustion turbine generator through a 13.8-kV/4.16-kV FR3 insulated auxiliary transformer. The 13.8-kV/4.16-kV auxiliary transformer would supply power to the 4.16-kV switchgear, which supplies in turn the large motor loads (such as the boiler feed pumps, simple cycle unit fuel gas compressors) and the high side of the 4.16-kV/480-volt auxiliary transformers. The 4.16-kV switchgear would have vacuum interrupter circuit breakers for the main incoming feeds and for power distribution.

Each 4.16-kV/480-volt auxiliary transformer would supply 480-volt, three-phase power to the combustion turbine generator and balance-of-plant 480-volt motor control centers. The motor control centers would provide power through feeder breakers to the various 480-volt motor loads, and other low-voltage plant loads, including 480-volt power distribution panels, and lower-voltage lighting and distribution panel transformers. Power for the alternating current power supply (240-volt/120-volt) system would be provided by the 480-volt motor control centers and 480-volt power panels. Dry-type transformers would transform 480-volt power to 240/120-volt power. Each auxiliary transformer would be located in its own containment area to contain any of the FR3 insulating fluid in the event of a leak or spill.

Each combined cycle fuel gas compressor would be equipped with a variable frequency drive to reduce power consumption during part load operations.

Provisions would be made to interconnect an emergency diesel generator to one of the simple cycle units.

3.1.8.3 125-volt Direct Current Power Supply System

The combined cycle units have a common 125-volt direct current system including redundant battery chargers located in the combined cycle Power Distribution Center and the simple cycle units have a separate 125-volt direct current system located in the simple cycle Power Distribution Center. The direct current power panels would supply direct current power to pumps, circuit breakers, and to the uninterruptible power supply system.

Under normal operating conditions, 480-volt, three-phase power is supplied to the battery chargers and continuously charge the battery banks while supplying power to the direct current loads.

Under abnormal or emergency conditions, when 480-volt power is unavailable, the batteries supply direct current power to the direct current system loads. Recharging of a discharged battery occurs whenever 480-volt power again becomes available.

3.1.8.4 Uninterruptible Power Supply System

Each power block would have a 120-volt alternating current, single-phase, 60-hertz uninterruptible power supply. The uninterruptable power supply system supplies power to instrumentation and loads which would include, but not be limited to, distributed control system operator stations, distributed control system controllers, and protection and safety systems.

The uninterruptible power supply system is supplied from two redundant sources: 1) the 480-volt system through a transformer, and 2) from the station 125-volt direct current batteries through an inverter which converts the direct current from the batteries to alternating current. A transfer system automatically transfers power between the sources to ensure that a continuous source of power is available.as well as.

3.1.8.5 Backfeed Capabilities

When a unit is shut down, it can backfeed power through its generator step-up transformer from the Kellogg Switchyard. Through cross-tie breakers between the 4.16 kV and 480-volt for adjacent units, a unit can still receive back feed power even if its generator step-up transformer is out of service. This arrangement allows any plant load to be energized without any combustion turbine generators in operation.

3.1.8.6 Construction and Commissioning Power Supply

The Project would use power from an existing Utility Operations Center on-site power source located at the Kellogg Switchyard for construction power.

3.1.8.7 Emergency Start Capability

A new 750 kW 4.16 kV alternating current emergency generator would be installed to provide emergency power to the existing simple cycle Unit 9 generating unit and to the new simple cycle units. In the event of the total loss of off-site power, the emergency generator would provide the necessary power to start one of the simple cycle units (the existing Unit 9 or one of the new simple cycle units). The output could then be used to startup other generating units. Emergency starting capability of Unit 9 and the Project would be used when necessary to feed the City's critical loads and to assist the Balancing Area Authority (LADWP) in restoring the area electric system.

3.1.9 Fuel System

The Project would utilize only natural gas through connection to existing SoCalGas infrastructure. Including the existing Unit 9, the maximum daily gas demand is anticipated to be 60 million standard cubic feet of natural gas and the anticipated average gas demand for the entire facility would be approximately 20 million standard cubic feet per day. Anticipated annual gas usage would be less than 7,500 million cubic feet per year.

3.1.10 Plant Cooling Systems

Two types of cooling system would be utilized for cooling equipment. Air cooled system where ambient air is drawn over finned tubes containing the media that must be cooled. The air is forced over the tubes via fans. To minimize water usage the simple cycle generator and all auxiliary equipment including the oil coolers, the gas compressor coolers, and other balance-of-plant auxiliary equipment requiring cooling would utilize closed loop air-cooled heat exchangers.

The second cooling system uses water as the cooling media. Wet cooling is used for the combined cycle combustion turbine and steam turbine generators and lube oil systems, as well as other miscellaneous heat loads. In wet cooling, cooling water supplied from the cooling tower is used to cool the heat loads. For oil systems, an intermediate closed cooling water system is between the oil containing equipment and the cooling tower water to provide additional protection in the event of oil to water tube leak. The cooling water is cooled in cooling towers where a portion of the water is evaporated to carry away the rejected heat, lost due to drift (circulating water that is emitted with the exhaust air of the tower), and blow down to maintain water quality. Recycled water is used to replace the water lost by evaporation, drift, and blowdown.

3.1.11 Water Supply and Use

3.1.11.1 Potable Water Supply

Potable water would be required for domestic and fire protection purposes only. Potable water would be used only for human contact applications including emergency eye wash and shower stations, drinking fountains, lavatories, change room showers, firefighting, and maintenance cleaning. Potable water would not be used for any power generation or cooling water purposes.

Potable water would be provided by the City of Glendale via the existing potable water services currently serving the Grayson Power Plant. This potable water would be supplied through an existing 8-inch pipeline under Air Way and a 12-inch pipeline from San Fernando Road at the southeast corner of the site. No work outside the boundary of Grayson Power Plant site is

contemplated. It is anticipated that one (1) acre-foot of City potable water would be required annually. A "Will Serve" letter from the City is attached in Appendix B.

3.1.11.2 Recycled Water Supply

Recycled water required for the Project would be furnished from the City of Glendale's recycled water system. Glendale's recycled water system delivers wastewater treated to Title 22, tertiary-treated and disinfected recycled water standards. Glendale's recycled water system's primary source is the Los Angeles-Glendale Water Reclamation Plant, with a back-up source from the City of Burbank's recycled water system. The first use of recycled water from the Los Angeles – Glendale Water Reclamation Plant was the Grayson Power Plant in 1978.

The repowered Grayson facility, including Unit 9, would consume only recycled water for process requirements. Recycled water would not be used where human contact is likely such as domestic consumption or fire protection.

Recycled water would be delivered to the site via an existing 16-inch pipeline owned by the City of Glendale and serving the City from the reclamation plant. The Project would utilize an existing 2.5-million-gallon underground concrete tank located on the south side of the Verdugo Wash for the recycled water storage tank to provide water in the event of low flow or outages at the reclamation plant. The existing 16-inch line serving the existing plant would be modified adjacent to the 2.5-million-gallon underground storage tank to fill the tank. Water would then be pumped back into the existing 16-inch line that would serve the Project's recycled water needs.

Recycled water would be used directly as cooling tower makeup water and steam generator turbine-800 evaporative air inlet cooling and then after being further processed to convert to demineralized water would be used for other uses such as heat recovery steam generator boiler feed water, simple cycle combustion turbine generator inlet air fogging and wet compression, simple cycle combustion turbine generator injection for NOx control, existing Unit 9, and for other purposes.

The use of recycled water and the existing 2.5-million-gallon underground storage tank would allow the existing on site water wells to be connected to the City's potable water system and put to a higher use for domestic supply by the City. The use of recycled water would eliminate the need for 20 acre-feet of well water and 41 acre-feet of potable water currently being used at the power plant.

Not all the water delivered to the Project would be consumed; a portion of the water from the numerous processes would be returned directly to the Reclamation Plant via the sewer system. Under the Project's anticipated maximum power generation rate during a month when maximum monthly recycled water consumption occurs, approximately 100 acre feet of recycled water would enter the Project from the Glendale's recycled system and 30 acre-feet of water would be returned to the reclamation plant for processing. If flows into the treatment

plant exceed its capacity, they are diverted to the Hyperion treatment plant for processing. During the year, it is anticipated that 860 acre-feet of recycled water may enter the Project from Glendale's recycled water system which is close to Grayson power plants historical uses. Approximately 370 acre-feet of recycled water a year over the last three years due to the current condition of the power plant has been used. In addition, due to turf removal projects in the last two years due to the extreme drought, Glendale's recycled water demands have been reduced by nearly 400 acre-feet per year as indicated in the "Will Serve" letter attached in Appendix B. As noted above, the additional recycled water use will also offset 61 acre-feet of potable water from wells and from water imported from the Metropolitan Water District of Southern California, which is the City's main water supply.

3.1.11.3 Recycled Water Treatment System

Makeup water[8] for the Project power blocks steam cycle would have virtually all dissolved minerals and other contaminants removed from the water by passing the recycled water through multimedia filters, ultrafiltration, a reversed osmosis system followed by a continuous electro-deionization system to create demineralized water for the project. The various water streams are:

- The demineralized water would be sent to two (2) 75,000-gallon storage tanks. It would provide approximately 24 hours of storage as well as provide for an extreme extended heat spell. Demineralized water is used for: a) makeup to the combined cycle unit condensers to replace water lost from blowdown from the steam drums, b) combustion turbine fogging/wet compression and NOx control for the simple cycle units, makeup to the closed cooling water systems, and for combustion turbine compressor water wash.

- The reject water stream from the reverse osmosis system would be discharged to the sanitary sewer.

3.1.11.4 Cooling Tower Cooling Systems

Two new cooling towers, using recycled water, would provide cooling water for use in the combined cycle plants. Each cooling tower would be approximately 55 feet by 100 feet and 35 feet in height, which is very similar to the existing cooling towers on site.

Cooling water is sent to the steam condenser to condense the steam turbine exhaust steam back into water to be fed to the heat recovery steam generator. It is also used to cool the closed loop cooling system required for the combined cycle gas turbine and steam turbine driven generators and lube oil coolers.

[8]Water supplied (as to a steam boiler) to compensate for loss by evaporation.

The primary use of recycled water is to condense steam back to water. Cooling water is pumped through a condenser where it is carried in pipes exposed to the exhaust steam from the steam turbine. The steam condenses to water and is pumped back through the heat recovery steam generator in a closed loop. The condensing steam transfers its heat to the cooling water flowing through the condenser. The heated cooling water is then pumped to a cooling tower, where fans draw air through the cascading water, cooling the water by evaporation. The cold water is then pumped back to the condenser.

A portion of the cooling water is evaporated to carry away the rejected heat, a small amount is also lost due to drift (circulating water droplets that are pulled along in the exhaust air of the tower), and some water is lost due to blow down to prevent the buildup of dissolved solids in the cooling water to maintain cooling water quality. Recycled water is used to replace the water lost by evaporation, drift, and blowdown. The cooling towers would be equipped with a mist eliminator that control drift fraction to no greater than 0.0005 percent of the recirculating water flow.

The closed-loop cooling system provides cooling water for various plant equipment such as the combined cycle combustion turbine generator coolers, and steam turbine generator coolers, and the combined cycle lubrication oil coolers. The primary means of removing this heat for this closed-loop system is via a heat exchanger where cold water from the cooling towers is circulated in an intermediate closed cooling water system between the oil containing equipment and the cooling water source which extracts the heat and then returns to warm water to the cooling tower to be cooled for re-use. The closed cooling water system provides an intermediate barrier between the oil containing equipment and the cooling tower basin water.

3.1.12 Emission Control and Monitoring

The City is required to apply for and receive permits from the South Coast Air Quality Management District (SCAQMD) in order to construct and operate the Project. City would utilize an emission offset exemption for one new combined cycle turbine that will replace existing Units 8A and 8BC pursuant to SCAQMD Rule 1304(a)(1) – Replacement in Kind. For the replacement in kind portion of the Project, SCAQMD would account for the new potential emissions through its own internal offset accounting system. The remainder of offsets needed for the Project are envisioned to be purchased by the City as Emission Reduction Credits (ERCs) in the open market, prior to the start of construction. These ERCs have been confirmed by SCAQMD to reflect real, permanent, and quantifiable emission reductions. Some offset credits can also be purchased from the SCAQMD's Priority Reserve Account to accommodate emissions from new turbine generating systems that would replace the existing Boilers 3, 4, and 5 pursuant to SCAQMD Rule 1304(a)(2) – Electric Power Replacement Units. However, City believes that adequate credits would be available from the open market and does not envision having to utilize SCAQMD Rule 1304(a)(2) for the Project.

Air emissions from the combustion of natural gas in the combustion turbine generators would be controlled to meet SCAQMD best available control technology requirements. To monitor that the emissions meet best available control technology standards, the combustion turbine generators would be equipped with continuous emission monitoring systems which measure stack temperature, gas concentration, such as oxygen, NOx, and CO, fuel input, generator output, and ammonia injection rate. The Air Quality Section 4.3, includes additional information on emission control and monitoring.

3.1.12.1 NOx Emission Control

Selective catalytic reduction is a means of converting nitrogen oxides, also referred to as NOx, with the aid of a catalyst into diatomic nitrogen (N_2) and water that would be used to control NOx concentrations in the exhaust gas emitted to the atmosphere. This process will limit NOx to 2.3 parts per million by volume, dry basis at 15 percent O_2 from the simple cycle unit exhaust stacks and 2.0 parts per million by volume, dry basis at 15 percent O_2 from the combined cycle turbine heat recovery steam generator exhaust stacks as required to be compliant with Best Available Control Technology established by the SCAQMD. The selective catalytic reduction technology would use 19 percent aqueous ammonia added to a stream of flue or exhaust gas that is adsorbed onto a catalyst to reduce the NOx concentrations. Ammonia slip (the concentration of unreacted ammonia in the exhaust gas) would be limited to 5.0 parts per million by volume, dry basis at 15 percent O_2 from the simple cycle and combined cycle turbines as required by the SCAQMD.

The selective catalytic reduction equipment would include the catalyst, an ammonia storage system, an ammonia vaporization and injection system, and monitoring equipment and sensors. The ammonia storage system consists of a new 12,000-gallon tank which would be constructed above a spill containment basin and equipped with sump vapor control. A pressure relief valve that would be set at no less than 25-pounds per square inch gauge would control ammonia emission from the storage tank. In addition, a vapor return line would be used to control ammonia emissions during storage tank filing operations. A new refilling station with a spill containment basin and sump would also be constructed. The new 12,000-gallon tank would be interconnected via piping and control valves with the existing 12,000-gallon tank currently serving Unit 9.

3.1.12.2 Carbon Monoxide and Volatile Organic Compounds

An oxidation catalyst, which is a process that oxidizes compounds in the gas or exhaust stream of the combustion turbine using a catalyst, would be used to reduce the carbon monoxide (CO) concentration and volatile organic compounds in the exhaust gas emitted to the atmosphere. The oxidation catalyst would limit carbon monoxide concentrations to 2.0 parts per million by volume, dry basis at 15 percent O_2 and Volatile Organic Compounds (VOCs) to 2.0 parts per million by volume, dry basis at 15 percent O_2 for the simple cycle combustion turbine generator units. It would limit carbon monoxide concentration to 1.5 parts per million by volume, dry basis

at 15 percent O_2 and volatile organic compounds to 2.0 parts per million by volume, dry basis at 15 percent O_2 for the combined cycle combustion turbine generator units. These limits would meet SCAQMD best available control technology requirements.

3.1.12.3 Particulate Emission Control

Particulate emissions (PM10 and PM2.5) would be controlled through the use of best combustion practices and the sole use of low-sulfur natural gas fuel. Best available control technology for particulate emissions from combustion sources is the use of natural gas. In addition, particulate emissions would be further limited by the use of a high-efficiency inlet air filtration system, which would remove particulates in the ambient air prior to entering the combustion turbine generator processes.

Particulate emission would be limited to 3.3 lbm/hr for the simple cycle units and 2.2 lbm/hr for the combined cycle units.

3.1.12.4 Continuous Emission Monitoring System

A continuous emissions monitoring system would sample, analyze, and record fuel gas flow rate, NOx and CO concentration levels, and percentage of oxygen in the Emission Control System and heat recovery steam generator exhaust stacks. The continuous emissions monitoring system would generate reports of emission data in accordance with SCAQMD permit requirements and would send alarm signals to the plant supervisory control system when emissions approach or exceed pre-selected limits.

3.1.13 Stormwater Collection, Treatment, and Disposal

The ground surfaces of the existing Grayson Power Plant are 100 percent paved and stormwater from any storm that is not captured within containment basins flows to several catch basins located within the site. These catch basins connect into five storm drain outfall lines that drain into either the Verdugo Wash or the Los Angeles River. Stormwater that is captured in containment areas is tested for oils or other contaminants before either being left to evaporate or discharged to the storm drain system. Water that does contain oil or contaminates is pumped to the oily water separator for treatment before being discharged to the City's sanitary sewer system.

As part of the Project's design, stormwater that is not captured in containment areas would be captured via a storm drain system and processed before being discharged either to the sanitary sewer or to the Verdugo Wash or Los Angeles River in compliance with current Regional Water Quality Control Board (RWQCB) rules and regulations. This process ensures pre-treatment before discharge or infiltration back into the groundwater basin.

The Project would be designed to contain stormwater that falls within process equipment areas containing hazardous materials, such as power transformers, lube oil storage tanks, and chemical storage areas, would be contained within a containment area. If oil or other contaminants are detected within a containment, the liquid would be pumped to the oily water separator for oil/grease removal.

The residual oil-containing sludge collected in the oil/water separation tanks would be collected via vacuum truck and disposed of as hazardous waste and taken to a reprocessing facility. The treated effluent from the oil-water separator would be combined with other clean process wastewater and cooling tower blowdown and pumped via a wastewater/blowdown lift station located on the site and that serves as a connection to an existing sewer line.

Stormwater that falls within the plant in pavement areas and outside the process equipment containment areas would flow via surface sheet flow and localized gutters to catch basins and on-site storm drain piping. The on-site, underground storm drain system would be sized for a 10-year storm event in accordance with City of Glendale and County of Los Angeles standards, and 50-year storm event in the case of a localized sump condition (ponding areas). A hydrology drainage study was prepared for the Project that indicates that the 50-year storm event would result in a flow rate of approximately 25 cubic feet per second of stormwater runoff to be discharged to the Verdugo Wash and Los Angeles River. However, plant buildings and equipment shall be located at an appropriate elevation such that the buildings and equipment do not flood during a 100-year storm event.

The stormwater collection, treatment, and disposal system would meet all applicable effluent discharge standards set by the Regional Water Quality Control Board and other regulatory agencies before discharging through the existing stormwater outfalls to the Verdugo Wash and the Los Angeles River. Flow[9] rates for storm runoff would be determined by the Rational Method using guidelines outlined in the County of Los Angeles Local Drainage Manual and the Los Angeles Hydrology Manual (County of Los Angeles 2017). This method is commonly used by municipalities, including Glendale, for calculating flow rates used in stormwater system design.

As described below, "first flush" runoff would be captured and treated by infiltration in accordance to the Regional Water Quality Control Board design criteria. The proposed system would result in improved drainage conditions and stormwater runoff quality.

The storm drain piping would be connected to an on-site collection and treatment system for the design storm event as required by state and local agencies for treatment. The design storm would account for the "first flush" of site stormwater runoff as determined from the Los Angeles County 85th percentile precipitation isohyet map that would be captured and treated by a new collection system that would allow for infiltration. Storm water from the catch basins would flow through an underground piping system to an underground vault-type multi-chamber treatment device that removes sedimentation, coarse materials, and oil from the water. Rainfall amounts

[9] Cities including Glendale typically use this manual for calculating flow rates used in the system design.

exceeding the 85th percentile would be discharged through the existing storm drains to the Verdugo Wash or Los Angeles River.

An onsite sampling location would be provided downstream of the treatment system to allow for sampling and testing of site runoff effluent prior to entering the adjacent channels. During storm events, larger than the design storm, overflow runoff would be discharged into the adjacent Verdugo Wash and Los Angeles River through existing stormwater outfalls.

A discussion of potential water quality impacts resulting from the Project including a discussion of stormwater and the requirements for a Stormwater Pollution Prevention Plan are included in Section 4.7.

3.1.14 Waste Management

Waste management ensures all wastes produced at the Project are properly collected and disposed. Wastes include plant process (cooling tower blowdown, clean water from the oily-water separator, clean liquid discharge from the water treatment facility) and sanitary wastewater, nonhazardous waste (liquid and solid), and hazardous waste (liquid and solid). Waste management is discussed in more detail in Section 3.2.5 Demolition Activities.

3.1.14.1 Plant Drains and Oily Water Separator

General plant drains would collect containment area wash down, sample drains, and drainage from facility equipment drains. Water from these areas would be collected in a system of floor drains, hub drains, sumps, and piping and routed to the process drain collection system. Drains that potentially could contain oil or grease would first be routed through an oily water separator that separates the oil for removal for off-site disposal at an approved wastewater disposal facility with the clean throughput being discharged to the City's sewer system.

The Project would have one oily water separator. The oily water separator would be an underground tank with a capacity of 3,000 gallons and a maximum throughput of 300 gallons per minute. Miscellaneous wastewaters, including those from combustion turbine water washes and from some water treatment cleaning operations, would be collected in holding tanks or sumps and would be trucked off-site for disposal at an approved wastewater disposal facility.

3.1.14.2 Wastewater Collection, Treatment, and Disposal

Processed wastewaters that do not contain oil or grease such as sanitary drains, Reverse Osmosis System reject, oily water separator effluent and cooling tower blowdown, and that meet the City of Glendale Industrial Waste Discharge Permit Requirements, would be discharged to the sewer system.

Other waste streams would be discharged to the cooling tower for reuse or collected and trucked off-site. For example:

- Blowdown from the heat recovery steam generator (condensate removed from the heat recovery steam generator drums to reduce water contaminants) would be discharged to a tank open to the atmosphere where some water vapor would be discharged to the atmosphere and the condensate would be discharged to the cooling towers for reuse in the cooling cycle.

- Steam turbine and steam line drains (condensate removed from the piping to preclude water being sent into the steam turbine) would be discharged to a standpipe connected to the condenser where it would be recovered and reused.

- Wastewater from the combustion turbine water washes would be collected in combustion turbine drain tanks and then trucked off-site for disposal or directed to the oily water separator depending on the chemistry of the water.

- Recycled water would be used for makeup to the SGT-800 combustion turbine air inlet evaporative coolers and the blow down from these coolers would be discharged to the cooling tower for reuse.

- Wastewater from equipment and floor drains in an area not containing hazardous materials would be directed to an oily water separator for removal of accumulated oil that may result from equipment leakage or small spills and large particulate matter that may be present from equipment wash-downs. The oils would be trucked off-site for disposal.

3.1.14.3 Sanitary Wastewater

Sanitary wastewater from sinks, toilets, showers, dishwashers, and other domestic facilities are typically discharged to the existing City's sewer system and would be discharged in the same manner with Project implementation. In addition, process wastewater that complies with City of Glendale Industrial Wastewater Discharge Permit such as waste water from the demineralization of recycled water, cooling tower blowdown, equipment drains and discharge of oil free water from the oily water separators would be sent to the sewer system.

The sewer water is discharged directly to Los Angeles-Glendale Water Reclamation Plant. It is anticipated that approximately 270 acre feet per year of wastewater would be discharged to the reclamation plant through the sewer system.

3.1.14.4 Solid Wastes

The Project would produce minimal maintenance and plant wastes such as cooling tower sludge, oily rags, broken and rusted metal and machine parts, defective or broken electrical

materials, used containers, and other refuse generated by workers. Solid wastes would be trucked off-site for recycling or disposal by an outside contractor.

3.1.14.5 Construction Waste

Construction of the Project would involve demolition of the existing generating units and ancillary facilities. These facilities would be characterized and disposed of appropriately. Construction of the Project would generate wastes such as packing materials and shipping material, surplus excavate soil, excess materials trimmed from standard-dimension materials, concrete spoil, temporary weather covers, consumable abrasive and cutting tools, broken tools, parts and electrical and electronic components, construction equipment maintenance materials, used containers, and other solid wastes, including worker refuse.

Where practical, solid waste would be segregated for recycling. Non-recyclable waste would be placed in covered dumpsters and removed on a regular basis by a certified waste-handling contractor for disposal at a Class III landfill (Scholl Canyon Landfill).

Some hazardous solid waste, such as welding materials and dried paint, may also be generated. The hazardous waste would be collected in containers near the points of generation. The contractor would temporarily store the hazardous waste in an approved hazardous waste storage area, and then deliver it to an authorized hazardous waste management facility before the expiration of the 90-day storage limit.

Hazardous wastes generated during construction and operations would be handled and disposed of in accordance with applicable laws, ordinances, regulations, and standards (LORS). Hazardous wastes would be either recycled or disposed of in a licensed Class 1 disposal facility, as appropriate.

Startup would generate waste typical of normal operation plus initial cleaning wastes such as rags, consumable materials, and parts that require replacement such as gaskets, waste lubricants, broken instruments.

3.1.14.6 Operations Waste and Hazardous Waste

Project operation would generate wastes resulting from routine facility maintenance, and office activities. Non-hazardous waste would be recycled to the greatest extent practical, and the remainder removed on a regular basis by a certified waste-handling contractor.

The Project would also produce non-hazardous maintenance and plant waste such as paper, wood, plastic, cardboard, broken and rusted metal and machine parts, defective or broken electrical materials, used non-hazardous containers, and other miscellaneous solid wastes including the typical refuse generated by workers.

Office paper, newsprint, aluminum cans, wood, insulation, yard debris, concrete, gravel, scrap metal, cardboard, glass, plastic containers, and other non-hazardous waste material would be recycled to the extent practical, and the remainder would be removed on a regular basis by a certified waste-handling contractor for disposal at a Class III landfill.

Hazardous waste would be accumulated at the generating facility according to California Code of Regulation Title 22 requirements, then it would be collected by a licensed hazardous waste hauler, using a hazardous waste manifest. Waste would only be shipped to authorized hazardous waste management facilities. Biannual hazardous waste generator reports would be prepared and submitted to the Department of Toxic Substances Control as required by law. Copies of manifests, reports, waste analyses, and other documents would be kept on-site and would remain accessible for inspection for at least 3 years.

Several methods would be used to properly manage and dispose of operational hazardous wastes generated by the Project. Waste lubricating oil would be recovered and recycled by a waste oil recycling contractor. Spent lubrication oil filters would be disposed of in a Class I landfill. Spent selective catalytic reduction and oxidation catalysts would be recycled by the supplier or disposed of in accordance with regulatory requirements. Workers would be trained to handle hazardous wastes generated at the site.

Chemical cleaning wastes would consist of alkaline and acid cleaning solutions used during pre-operational chemical cleaning and in turbine wash waters. These wastes, which are subject to high metal concentrations, would be temporarily stored on-site in portable tanks or sumps, and disposed of off-site in accordance with applicable regulatory requirements.

3.1.15 Management of Hazardous Materials

A variety of chemicals would be stored and used during the Project construction and operation (see Section 4.5 for a list and quantity of material proposed to be used). The storage, handling, and use of all chemicals would be conducted in accordance with applicable LORS. Chemicals would be stored in appropriate chemical storage facilities, bulk chemicals would be stored in storage tanks, and most other chemicals would be stored in returnable delivery containers. Chemical storage and chemical feed areas would be designed to contain leaks and spills. Berms would allow a full-tank-capacity spill without overflowing the berms. For multiple tanks located within the same bermed area, the capacity of the largest single tank would determine the volume of the bermed area.

Hazardous materials used during construction of the Project would be kept in a designated area. Appropriate measures would be provided, including approved dual-walled tanks, fueling equipment, containment, supply of absorbent material, and disposal containers for waste lubricants. Temporary containments would be sized to hold the appropriate volumes. Stored hazardous materials would be inspected daily for leaks and container failure.

A variety of hazardous reagents and materials would be stored and used at the Project in conjunction with operations and maintenance of the Project. Chemicals would be stored in appropriate chemical storage facilities. Bulk chemicals would be stored in storage tanks and most other chemicals would be stored in returnable delivery containers. Chemical storage and chemical feed areas would be designed with secondary containment to contain leaks and spills. Concrete containment pits and drain piping design would allow a full-tank capacity spill along with a 25-year storm event without overflowing the containment area.

The containment for multiple tanks located within the same containment area would be equal to 120 percent of the capacity of the largest single tank, plus rainfall from a 25-year storm event and six-inches of freeboard.

Containment areas subject to rainfall would be provided additional containment volume sufficient to contain the rainfall from a 25-year, 24-hour storm event, firewater flow, plus six-inches of freeboard. Drain piping for reactive chemicals would be trapped and isolated from other drains to eliminate noxious or toxic vapors.

Safety showers and eye wash stations would be provided adjacent to, or in the vicinity of, chemical storage and use areas. Plant personnel would use approved personal protective equipment during chemical spill containment and cleanup activities. Personnel would be properly trained in the handling of these chemicals and instructed in the procedures to follow in case of a chemical spill or accidental release. Adequate supplies of absorbent material would be stored on-site for spill cleanup.

The ammonia tank containment structure would be designed and installed to specifically limit the amount of ammonia vapor involved in the event of a tank failure and during the filling of the tank. Area sensors would be installed at the ammonia vaporization skid areas to monitor for ambient ammonia concentrations. Alarms would be designed to annunciate in the control room with local audible alarms for ammonia releases at the facility.

Electric equipment insulating materials would be specified to be free of polychlorinated biphenyls (PCBs).

3.1.16 Fire Protection

The fire protection system would be designed to protect personnel and limit property loss and plant downtime in the event of a fire and would be designed to meet all laws, ordinances, regulations and standards (LORS) for the Project. The primary source of fire protection water would be the City of Glendale's potable water system.

The overall fire protection system would include a fire protection water system, CO_2 fire suppression systems for the combustion turbine generators, FM200 fire suppression systems or a mist system for the normally unoccupied Power Distribution Centers and the Plant Operations Building's communication room, portable fire extinguishers located around the site and in

buildings as dictated by local codes and the Fire Marshall, and an automatic fire sprinkler system for the steam turbine building, Plant Operations Building, and other habitable buildings.

Fire protection water for the Project would be supplied via connection to the City's 8- and 12-inch potable water distribution system that is currently providing fire protection for the existing Grayson Power Plant. The layout of new equipment and systems would require replacement of most of the existing fire water distribution system within the Grayson Power Plant site. New on-site dedicated underground fire loop piping system with fire hydrants connected to the fire-water loop would be constructed for the Project in compliance with National Fire Protection Association guidelines and the City of Glendale Fire Department requirements. Three fire hydrants adjacent to the existing Unit 9 as well as two additional temporary fire hydrants to be located along the westerly boundary of the Project Site would remain in place and operational during the demolition and construction phases.

The plant design would include a central fire alarm monitoring panel located in the main plant control room. The fire alarm panel would continuously monitor all plant fire protections systems and alert the control room operator in the event of a fire. In the event of a fire alarm, the panel would also send a direct fire alarm signal to the City's Fire Department as well as the GWP power dispatch control office.

No new off-site pipelines would be needed for fire protection. The Project in concert with the City's Fire Department has developed a fire protection Design Basis Document that would be implemented as part of the Project. The City of Glendale Public Works Department and City of Glendale Fire Department determined there will be no significant change in service level required to serve the Glendale Repowering Project with Police and Fire services, respectively. "Will Serve" letters from both the Police Department and the Fire Department can be found at Appendix B.

3.1.17 Plant Auxiliaries

Plant auxiliary systems not previously discussed would support, protect, and control the Project's utilities including lighting, grounding, control systems, cathodic protection, service air and instrument air systems.

3.1.17.1 Lighting

During construction, the Project will require lighting for security and safety, and for those activities allowed at night by Glendale's noise ordinance. All lighting would be of minimum necessary brightness consistent with worker safety and security. All fixed position lighting would be shielded/hooded, and directed downward and toward the area to be illuminated to prevent direct illumination of the night sky or direct light trespass (direct light extending) outside the boundaries of the Project site. Low pressure sodium vapor lighting or overhead high pressure

sodium vapor lighting with shields or cutoff luminaries would be utilized. Lights would be turned off when not needed for construction safety reasons or security.

After completion of construction and during the operation of the Project, lighting would be required at night for safety and security. Comparable to existing lighting at Grayson, the lighting system would provide illumination for operation under normal conditions, for safety under emergency conditions, and for manual operations during a power outage. The system would also provide 120-volt convenience outlets for portable lamps and tools. To the extent feasible, consistent with safety and security considerations, and commercial availability, the Project would design and install all permanent exterior lighting utilizing LED lights such that: a) light fixtures do not cause obtrusive spill light beyond the Project site; b) lighting does not cause excessive reflective glare; c) direct lighting would not illuminate the nighttime sky; d) illumination of the Project and its immediate vicinity is minimized; and e) the plan complies with local policies and ordinances.

To reduce off-site lighting, lighting for the Project would be restricted to areas required for safety and operation. Exterior lights would incorporate commercially available fixture hoods/shielding with light directed downward or toward the area to be illuminated in order to minimize glare and light spill off the site. LED fixtures of a non-glare type would be used. In addition, switched lighting circuits would be provided for areas where lighting is not required for normal operation or safety to allow these areas to remain dark at most times and to minimize the amount of lighting potentially visible off-site. All lighting would be of minimum necessary brightness consistent with operational safety and security.

3.1.17.2 Grounding and Lightning Protection

The station grounding system provides a safe path to permit the dissipation of current created by these events because the electrical system can be susceptible to ground faults, lightning, and switching surges that produce high fault currents that constitute a hazard to personnel and electrical equipment.

The station grounding grid would be designed for adequate capacity to dissipate the ground fault current from the ground grid under the most severe conditions in areas of high ground fault current concentration. The grid spacing would maintain safe voltage gradients. Bare conductors would be installed below grade in a grid pattern. Each junction of the grid would be bonded together by applying molten metal to permanently join the conductors. Ground resistivity testing and analysis would be used to determine the numbers of ground rods and grid spacing necessary to meet the minimum ground resistivity to ensure safe step and touch potentials under severe fault conditions such as a short circuit or open circuit fault. Grounding conductors would be brought from the ground grid to connect to building steel and non-energized metallic parts of electrical equipment.

3.1.17.3 Plant Control System

The Plant Control System Is a common computerized system that provides operator supervisory control of each unit as well as supporting simultaneous operation of all units. The Plant Control System will gather, process, and display sufficient plant process information as well as providing control of equipment and devices to allow the power plant operator siting in the control room to start, monitor, adjust load, shut down, and troubleshoot each of the power blocks. It will be integrated with the plant distributed controls and will provide modulating control, digital control, monitoring, and indicating functions for each power block.

The Plant Control System would provide the following functions:

- Integrated control of the combined cycle and simple cycle units coordinating the combustion turbine generator, steam turbine generator, heat recovery steam generators, and other systems.
- Control the balance-of-plant systems in response to plant demand.
- Monitor controlled plant equipment and process parameters and deliver this information to plant operator.
- Provide control displays (printed logs, LCD video monitors) for signals generated within the system or received from the input/output equipment.
- Provide consolidated plant process status information through displays presented in a timely and meaningful manner.
- Provide alarms for out-of-limit parameters or parameter trends, display on alarm video monitor(s), and record on an alarm log printer.
- Provide storage and retrieval of historical data.

The Plant Control System includes a redundant microprocessor-based system that consists of the following major components:

- Operator and engineering consoles with display video monitors.
- Input/output, relay, and processor cabinets.
- Historical data unit.
- Printers.
- Data links to the local equipment control systems.

The Plant Control System would allow for integration of balance-of-plant equipment that may be controlled locally via a programmable logic controller. The Plant Control System would interface with the distributed plant control systems to provide remote control capabilities, as well as data

acquisition, provide critical information to the operator, and historical storage of operating information. The system would be designed with sufficient redundancy to preclude a single device failure from significantly affecting overall plant control and operation. This also would allow critical control and safety systems to have redundancy of controls and an uninterruptible power supply. Daily operator logs would also be available for review to determine the status of the operating equipment.

3.1.17.4 Cathodic Protection

Cathodic protection is a technique used to control the corrosion of a metal surface by connecting the metal to be protected to a more easily corroded "sacrificial metal" to act as the anode to be corroded rather than the metal being protected. It would be designed to control the electrochemical corrosion of designated metal piping buried in the soil. Depending on the corrosion potential and the site soils, either passive or impressed current cathodic protection would be provided.

3.1.17.5 Service Air

The service air system supplies clean, dry, oil-free compressed air for use by the instrument air system, equipment service air needs, and to hose connections for general plant use. Service air headers would be routed to hose connections located at various points throughout the facility. Service air utility connections would be provided with a backpressure regulating valve to maintain a minimum service air system pressure, regardless of service air use. For purposes of reliability, the Project would have three 100-percent-capacity air compressors. The service air and instrument air system would be fed from the same compressors.

3.1.17.6 Instrument Air

The instrument air system would provide dry air to pneumatic operators and devices. An instrument air receiver would be located at the each of the four units, the two gas compressor areas, and within the water treatment facility where pneumatic operators and devices would be located. Each instrument air receiver would include a check valve so that instrument air pressure is not lost during a low-pressure condition within the service air system.

3.1.18 Surface Treatment of Project Structures and Buildings and Site Surface Restoration

All Project structures and building visible to the public would be treated such that a) their color(s) minimize(s) visual intrusion and contrast by blending with the existing Unit 9 on site; b) their color and finishes would not create excessive glare; and c) their color and finishes would be consistent with local policies and ordinances. Exposed major generating equipment, stacks, building, and cooling towers would be of a tan/beige color. Pipe racks, stair towers, and platforms would be galvanized steel.

Upon completion of construction, all evidence of the laydown area and linear facility construction activities would be restored to the original condition or better condition.

3.2 DEMOLITION ACTIVITIES

Demolition of existing Grayson Power Plant support structures and equipment, except for Unit 9, would be completed to facilitate construction and operation of the Project. The demolition phase of the Project is expected to take approximately nine (9) months.

Demolition would include the removal of all buildings, most infrastructures, and any contaminated soil to a depth of roughly eight to ten feet below existing grade or to below the floor of existing subsurface installations to ensure a relatively clean site for the new construction. The existing site contains numerous piles that support the existing structures and equipment. These piles would either be removed where they are under relatively shallow existing foundations or left in place under the basement of the existing boiler structures. The concrete oil containment vessels located under four of the five existing cooling towers would be removed and the area around these vessels would be tested and mitigated as provided for in the Soil Management Plan. Any contaminated soil, lead, and asbestos would be remediated and removed to an approved disposal site. Certain electrical ductbanks, sewer lines and storm drain piping would be left in place.

This work would involve lead and asbestos removal, the removal and salvaging of the existing generating units if possible, removal of the five existing cooling towers, removal of foundations and piles, removal of concrete filled underground tanks, removal of small auxiliary mechanical and electrical equipment associated with the existing Grayson Power Plant, and removal of existing pipelines and removal of electrical ducts that would not be able to be used as part of the Project. Known underground piping, conduits and structures which must be retained may be relocated or rerouted as required.

Not included in the demolition scope are:

- Unit 9 (simple cycle GE LM6000 PC sprint completed in 2003);
- Unit 9 generator step-up transformer;
- Unit 9 ammonia storage tank and piping;
- Natural gas supply, transmission, and fire protection required to support Unit 9 operations during demolition and construction of the Project;
- Kellogg 69-kV Gas Insulated Switchgear (GIS) Switchyard;
- Underground structures and utilities if their location does not interfere with constructing and operating the Project without being relocated or removed; and

- Other buildings and equipment located on the City's Utility Operations Center site, but outside of the Project site (e.g. city garage, superintendent's building, warehouse, fuel island, etc.).

Certain storm drains and other infrastructure may remain depending on final grading and drainage plans.

The Project would commence with the demolition of all buildings, ancillary structures, and equipment on the Project site except Unit 9 and its permanent and temporary ancillary services. The demolition precedes construction to the Project facility to clear the way for the new construction.

The demolition at the Grayson Power Plant would commence in the second quarter or early in the third quarter of 2018, and be completed in the first quarter of 2019. Construction of the Project is scheduled to commence during the first quarter of 2019.

In order to facilitate the Repowering of Grayson, Los Angeles Department of Water and Power (LADWP) has agreed to assist GWP during the repower Project in accordance with the following terms; Term – up to eight years beginning January 1, 2015, Delivery at Air Way receiving station, Quantity up to 75 MW during peak period hours and up to 25 MW during off-peak hours, to ensure that the City will have sufficient electrical energy to serve its customers.

3.2.1 Demolition Manpower

The demolition crew is anticipated to consist of 60 persons at any one time. Manpower would vary depending on the specific activities being performed. Various skill sets would be required for equipment operation, truck driving, asbestos and lead abatement, dismantling of structures, health and safety monitoring, sampling, and general housekeeping. Demolition activities would take approximately nine months starting during the second quarter of 2018, and be completed during the first quarter of 2019.

Professional labor for the demolition would include project management, construction management, planning and permitting specialists, health and safety specialists, quality assurance/quality control engineers, project controls engineers, accounting and procurement specialists, and administrative specialists.

3.2.2 Demolition Equipment

The following types of equipment would be used for the demolition of the existing Grayson Power Plant facilities. Actual equipment may vary depending on the selected demolition contractor and the availability of equipment.

- 35- and 75-ton portable cranes
- Excavators with various attachments

- Backhoes with various attachments
- Front-end loaders
- Fork lifts
- Compactors
- Dozers
- Scraper/Grader
- Various support vehicles such as water trucks (dust control), fueling/service vehicles, welding trucks, and pickup trucks

It is anticipated that at the beginning of demolition during the first month approximately 12 trucks would deliver this equipment to the Project and during the ninth month of demolition the same number of trucks would remove this equipment from the Project.

3.2.3 Demolition Schedule

Table 3-3 discussed in Section 3.3 lists the Project major milestones, including demolition dates. Figure 2-3 shows the existing facilities that would be removed as part of the demolition phase.

Demolition would occur between 7:00 a.m. and 7:00 p.m., Monday through Saturday, excluding City recognized holidays.

3.2.4 List of major equipment and buildings to be demolished

- Unit 1 (boiler, building, steam generator, foundations)
- Unit 2 (boiler, building, steam generator, foundations)
- Unit 3 (boiler, building, steam generator, foundations)
- Unit 4 (boiler, building, steam generator, foundations)
- Unit 5 (boiler, building, steam generator, foundations)
- Unit 8A and Unit 8BC (combustion turbine generators, heat recovery steam generators, foundations, piles)
- Units 1, 2, 3, 4, and 5 steam turbines, condensers, pumps, and associated equipment
- Transformers, switches, switchyard, and power distribution system
- Cooling Towers
- Water treatment and storage facilities
- Chemical Storage (aqueous ammonia storage and all chemical treatment skids) associated with the units being demolished and removed
- Plant air system
- Plant water and fire water distribution

- Plant fuel gas systems and piping (except Unit 9)
- Power Plant Maintenance Shops
- Power plant control rooms and offices

3.2.5 Demolition activities

Demolition includes the removal of buildings and equipment listed above. These buildings and some of the existing piping insulation may contain asbestos and lead paint.

The first activity would be to temporarily reroute existing fire protection water system to be available for fire protection during demolition and construction. Above ground structures and equipment would be removed first. Areas containing asbestos or lead paint would be cordoned and secured such that non-protected workers would not be able to enter the area and no dust would be able to leave the area. Asbestos and lead paint containing articles would be removed by California certified and appropriately protected workers.

The demolition activity would be the removal of buildings and equipment. Non-hazardous equipment and materials such as steel, aluminum, copper, and other metals would be recycled and non-recyclables would be trucked and disposed of in the nearby Scholl Canyon Landfill. It is anticipated that an average of ten truckloads and a maximum of 20 truckloads of waste material would be shipped from the Project site most days during demolition to be recycled or transported to the landfill.

After above ground structures are removed, underground tanks, piping, duct banks, conduits and underground structures would be removed. As much of the existing underground pylons and pilasters would be removed as possible and those that cannot be removed or located within non-critical areas where they would not interfere with new equipment footings would be cut off at approximately ten-foot below grade and left in place.

Metal with intact lead-based paint can be recycled. However, the abatement contractor would confirm with the receiving facility before sending. Where lead-based paint is flaking, or peeling from a metal surface, these areas would need to first have the loose or flaking paint removed before recycling the metal. Disposal of non-metal items with lead-based paint would also need to have the loose paint removed before disposal at a landfill.

For asbestos, there is no way of recycling or "reprocessing" these materials. The friable (able to be crumbled, pulverized, or reduced to powder by hand pressure) asbestos would be sent to a Class I Landfill, most likely La Paz County Landfill in Parker, Arizona. If segregated from friable asbestos, building materials with non-friable asbestos may be disposed at Azusa Land Reclamation in Azusa, California. More than likely all abated asbestos would be sent to a Class I Landfill.

Table 3-2 provides a list of designated licensed waste disposal facilities for management of waste generated by the Project.

Table 3-2 Waste Management Designated Licensed Disposal Facilities

Solid Waste Type	Designated Licensed Disposal Facility Location
Non-hazardous Materials (Class II, III landfill and recycling facilities)	**Azusa Land Reclamation (Solids Disposal, Class II & III)** 1211 W. Gladstone Azusa, CA 91702 Phone: (800) 963-4776 **Scholl Canyon Landfill** 3001 Scholl Canyon Road Glendale, CA 91206 Phone: (818) 243-9779
Hazardous Soil (Class I landfill)	**Clean Harbors Facility (Solids Disposal, Class I & II & III)** 1737 East Denni Street Wilmington, CA 90744 Phone: (310) 835-9998
Asbestos	1. La Paz County Landfill (Class I) 2. La Paz County 26999 Hwy 95., mile post 128, 3.5mi S of Jnct of Hwys 95 & 72, Parker, AZ 85344 Phone: (928) 669-8886

3.2.6 Protection of Adjacent Areas During Demolition

Prior to any site mobilization, demolition, and construction activities, including linear facilities, a Stormwater Pollution Prevention Plan will be prepared as required under the General National Pollutant Discharge Elimination System Stormwater Construction Activity Permit for the Project. The Stormwater Pollution Prevention Plan would include both temporary and final drainage and facility design for all on- and off-site facilities to ensure protection of adjacent areas. In addition, an Erosion and Sedimentation Control Plan for the demolition and construction phases of the Project would be developed and implemented to prevent significant on-site flooding and the potential for significant impacts to adjacent off-site areas.

All areas where demolition would be occurring would be watered regularly to prevent all fugitive dust plumes from leaving the site. Unpaved areas would also be watered regularly to prevent fugitive dust plumes from leaving the site. Trucks hauling material from the site would either have their tires washed or be driven over a devise to ensure any loose material in removed from the tires before leaving the site. Trucks would be provided with covers.

3.2.7 Materials Reuse and Recovery

Demolition would feature reclamation or recycling of all non-hazardous materials. Equipment and materials such as steel, aluminum, copper, and other metals would be recycled and non-recyclables would be trucked and disposed of in the nearby Scholl Canyon Landfill. Intact machinery and equipment that can be salvaged and reused would be sold to companies

specializing in refurbishing and offering such equipment for sale on the secondary markets. Some of the equipment may be retained as spares for the existing Unit 9 or the Project. Existing asphalt and concrete would be ground down and reused on site or made available to others.

3.3 PROJECT CONSTRUCTION

Site demolition, project construction, and initial commercial operation is expected to take approximately 27 months. Mobilization is anticipated to commence after demolition is completed during the first quarter of 2019, and commercial operation is anticipated prior to the summer peak demands of 2021.

Construction activities would include the installation of underground electrical ductbanks and vaults, underground piping for water, sewer, gas, air, and fire protection, engineered backfill up to finished grade, construction of concrete foundations to support the generation and ancillary equipment, driving of upwards of 1,000 piles as part of the major equipment foundations, erecting of all the equipment and ancillary equipment, above ground piping and electrical wiring, installation of storm drains piping and catch basins, finished paving, and startup and commissioning of the plant.

The driving of the piles would be done using two pile driving rigs, each capable of driving up to 15 piles per day. It is estimated that the pile driving activity could last as long as ten weeks, but is projected to be around seven weeks. The pre-stressed piles would be delivered by trucks to support the pile driving activity. Noise and sound barriers would be utilized to reduce noise level.

Major milestones are listed in the Table 3-3 below:

Table 3-3 Project Schedule Major Milestones

Activity	Start	Finish
Demolition	06-18	03-19
Construction Mobilization	03-19	04-19
Grading, Substructures, Foundations	04-19	02-20
Place Piles	06-19	08-19
Set and Erect Major Equipment	09-19	12-20
Commissioning of Units	08-20	06-21
Commercial Operation	03-21	06-21

3.3.1 Construction Schedule and Workforce

Construction would typically be limited to the hours between 7:00 a.m. and 7:00 p.m., Monday through Saturday, excluding City recognized holidays. It is possible that some pouring of concrete for large foundations due to the need to have one continuous pour may be conducted outside these typical construction hours. Smaller foundations would be poured during normal work hours. Any construction activities that are necessary to occur after 7:00 p.m. and before 7:00 a.m. or on Sundays would be limited to the degree feasible and are not

expected to include high noise producing activities such as pile driving. During the commissioning and startup phase of each of the power blocks, some activities would continue 24 hours per day, 7 days per week, including performance and emission testing. Construction and commissioning activities proposed outside the typical hours and days, if necessary, would require and be conducted in accordance with a variance issued by the City of Glendale.

The average workforce during the approximately 27 months of construction and commissioning is estimated to be 115 persons and peak workforce of approximately 260 craft people, supervisory, support, and construction management personnel to be on-site during construction. Peak workforce would occur in in the second quarter of 2020.

3.3.2 Construction Plans

An Engineer-Procurement-Construction contractor would be selected for the engineering, procurement, and construction of the facility. Subcontractors would be selected by the Engineer-Procurement-Construction contractor for specialty work as needed. Engineering plans would be prepared by the Engineer-Procurement-Construction contractor and submitted to regulatory agencies for approval prior to start of any construction. The power island equipment would be supplied by the Power Island Equipment contractor.

3.3.2.1 Mobilization

The Engineer-Procurement-Construction contractor would mobilize after the demolition phase of the Project is complete. Initial site work would include installation of temporary construction power throughout the project, implementation of best management practices and preparation of stormwater controls in accordance with the prepared Stormwater Pollution Prevention Plan. A rock aggregate would be used for temporary roads, laydown, work areas, and on-site construction parking areas. Mobilization is anticipated to take approximately one month during the first or second quarter of 2019.

3.3.2.2 Construction Office Facilities

Temporary construction trailers would be used as shared offices for construction staff as well as construction offices for City, contractor, and subcontractor personnel, and the Power Island Equipment contractor.

Construction parking would be provided offsite at a location under the Fairmont Avenue flyover with ingress and egress via Doran Street and within the Utility Operations Center boundaries with ingress and egress provided via the main gate on Fairmont Avenue.

3.3.2.3 Construction Staging and Storage

In addition to field office siting, areas within the site would be used for offloading and staging and for storage of materials, equipment, and vehicles. The Project would utilize space within the

Utility Operations Center and under adjacent Highway 134 to provide construction laydown and construction parking, and an approximate six-acre off-site laydown area located north of the Project site on Flower Street adjacent to the Griffith Manor Park (1551 Flower Street) and currently owned by Disney (Figure 3.2).

Construction access would be generally from Fairmont Avenue. Large or heavy equipment, such as the turbines, generators, generator step-up transformers, and heat recovery steam generator modules would be delivered to the site by heavy haul truck/trailer.

3.3.2.4 Emergency Facilities

Emergency services would be coordinated with the City's Fire Department, Police Department and hospitals. Urgent care facilities are available for non-emergency physician referrals. First aid kits would be provided around the site and would be regularly maintained. At least one person trained in first aid would be part of the construction crew. In addition, all foremen and supervisors would be given first aid training and would be trained in the use of a portable automatic external defibrillator located at the construction office.

Fire extinguishers would be located throughout the site at strategic locations at all times during construction and water for fire protection would also be available during demolition and construction. The City Public Works Department and City Fire Department determined there will be no significant change in service level required to serve the Glendale Repowering Project with Police and Fire services, respectively, the "Will Serve" letters can be found at Appendix B.

3.3.2.5 Construction Utilities

During construction, existing Utility Operations Center utilities would be used for the construction offices, laydown area, and the Project site. The City would provide temporary construction power. Area lighting would be provided and strategically located for safety and security.

Construction water would be potable water supplied by the existing GWP water system and by water truck deliveries as necessary. Average daily use of construction water over the 32-month demolition and construction period is estimated to be approximately 10,000 gallons, primarily for dust suppression. The maximum monthly water use is estimated at 300,000 gallons, during hydro testing of piping. The hydro test water would be tested, and if suitable would be reused, or disposed of in accordance with applicable LORS. Other construction water uses include compaction, concrete placement, grouting, curing, and cleaning. Portable toilets would be provided on-site.

3.3.2.6 Site Services

The following site services would be provided by the Engineer-Procurement-Construction contractor:

- Injury and Illness Prevention Plan training;
- Environmental health and safety training;
- Environmental compliance monitoring;
- Site security;
- Site first aid;
- Construction testing (e.g., nondestructive examination, hydrostatic testing);
- Fire protection including extinguisher maintenance;
- Furnishing and servicing of sanitary facilities;
- Trash collection and disposal; and
- Disposal of hazardous materials and waste in accordance with local, state, and federal regulations.

3.3.2.7 Construction Materials and Equipment

Construction equipment would be delivered to the Project site during mobilization and continue up through commissioning and startup of the Project. Appendix D includes detailed information on the types, quantities, horsepower (hp) and anticipated use duration anticipated for demolition and construction. All diesel-fueled engines used in construction of the Project would be fueled only with ultra-low sulfur diesel, which contains no more than 15 ppm sulfur. The City would require each of its construction and demolition contractors to find and use off-road construction diesel equipment that has a rating of 100 hp to 750 hp and that meets the Tier 3 California Emission Standards for Off-Road Compression-Ignition engines as specified in Title 13, California Code of Regulations section 2433(b)(1). All construction diesel engines, which have a rating of 50 hp or more, would meet, at a minimum, the Tier 2 California Emission Standards for Off-Road Compression-Ignition Engines.

Materials such as pipe, wire and cable, reinforcing steel, structural steel, building materials, and similar materials would be delivered throughout the construction process to the site by trucks. During days when pouring of concrete takes place, an average of six concrete trucks per day would be carrying concrete to the project site. This would be spread out for up to ten months. During a very limited number of very large concrete pours, up to a maximum of 80 concrete trucks per day would be delivering concrete during critical short period of times. In addition, approximately six trucks per day would deliver piles during to the site during the pile driving phase of construction. Oiler and fuel carrying maintenance trucks, surveying truck, and others similar medium size trucks would be delivering tools and equipment to the job on most days

during construction. Heavy equipment items would be transported with goldhofer or equivalent carriers that would require oversize/weight permits. Electric air compressors and welding units would be permanently located on site during construction. Appendix J includes additional detail and assumptions on vehicle and truck trip rates and distribution during Project demolition and construction. With the exception of heavy hauls and concrete deliveries, truck deliveries of construction materials and equipment would generally occur on weekdays between 9:00 a.m. and 2:00 p.m. Heavy haul equipment deliveries would be scheduled with the City's Police and Fire Departments to meet California Highway Patrol requirements and avoid traffic congestions during business hours.

3.3.2.8 Construction Lighting

Construction is not anticipated to routinely take place during darkness when lighting would be required. During those periods when concrete is poured, or during commissioning when nighttime activities cannot be avoided, concentrated area specific lighting in compliance with worker safety regulations would be utilized.

During limited construction periods and during the commissioning/startup phase of the Project, some activities would continue 24 hours per day, 7 days per week. Task-specific lighting would be used to the extent practical while complying with worker safety regulations. Lighting consisting of maximum 15-foot high pole mounted floodlight with appropriate visors and glare shields angling 45 degrees below the horizon would be provided for nighttime safety lighting.

3.3.2.9 Construction Best Management Practice

Best management practices would apply to all construction activities and would be required from the time of land clearing, demolition, or commencement of construction until receipt of a certificate of occupancy. The best management practices selected for each development construction project would be as set forth in the Stormwater Best Management Practice Handbook as published by California Stormwater Quality Association. (Ord. 5857 § 13, 2015)

Sediments generated on the project site would be retained using adequate treatment control or structural control. Construction related materials, wastes, spills, or residues would be retained at the Project site to avoid discharge to streets, drainage facilities, receiving waters or adjacent properties by wind or runoff. Non-stormwater runoff from equipment and vehicle washing and any other activity would be contained at the Project site. Erosion from slopes and channels would be controlled by implementing an effective combination of Best Management Practices such as the limiting of grading during rain events and covering erosion susceptible slopes.

As part of the Project, the Engineer-Procurement-Construction Contractor would be required to certify that construction best management practices are implemented at the construction site. The Engineer-Procurement-Construction Contractor would be required to prepare and submit to the City for approval a Stormwater Pollution Prevention Plan prior to initiating any demolition,

grading or construction of the Project. The Engineer-Procurement-Construction Contractor would be required to apply for a state General Permit for Stormwater Discharges associated with the Project.

All unpaved roads and disturbed areas in the Project site would be watered as frequently as necessary to prevent all fugitive dust plumes from leaving the site during construction activities and water would be available to prevent dust from occurring during demolition or during activities where water truck would not be effective. All unpaved exits from the construction site would be graveled or treated to prevent track out to public roadways and all construction vehicles would enter the construction site through the treated entrance. All vehicles that are used to transport solid bulk material on public roadways and that would have the potential to cause visible emissions from the material would be provided with a cover, or the materials would be sufficiently wetted and loaded onto the trucks in a manner to provide at least two feet of freeboard. All storage piles and disturbed areas that remain inactive for an extended period shall either be covered or treated appropriate dust suppressant compounds.

Design of the Project would be in accordance with the Federal Spill Prevention, Control, and Countermeasure Regulation providing berms, secondary containment, etc., to ensure any spills of chemicals or oils are contained on site and do not enter the storm drain system and get discharged to either the Verdugo Wash or the Los Angeles River.

3.4 FACILITY OPERATION

The facility would be operated year-round (24 hours per day, 7 days per week, 365 days a year) to serve electricity demand and provide ancillary services necessary for GWP to integrate renewable energy into its energy portfolio, manage the intermittent energy at the interconnection with the Balancing Authority Area (LADWP), and provide local system reliability.

The ancillary services that are necessary for GWP to integrate renewables, manage the interconnection, and provide local system reliability include load-following, regulation up and down, spinning and non-spinning reserves, voltage regulation, reactive power support, and frequency stabilization.

One power block, preferable a combined cycle, would always be in-service year-round under automatic generation control providing these services with one simple cycle power block on reserved shutdown providing the non-spinning reserves. The remaining power blocks would either be in reserved shutdown, in-service to meet load and/or provide additional ancillary services, or undergoing an outage. Automatic generation control would manage the inadvertent energy at the interconnection by increasing or decreasing the load as required by the electrical demand of the city.

All of the proposed power blocks would have capabilities necessary to provide these services; capabilities including fast startup simple cycle power blocks, significant turndown, fast ramp rates, automatic generation control, and 0.8 power factor generators. In addition, the simple cycle units offer the ability to start and achieve full load within 10 minutes. Plus, the facility would be able to manage dynamic scheduling. Dynamic scheduling is "a telemetered reading or value that is updated in real-time [4 second intervals] and used as a schedule in the automatic generation control/area control error equation and the integrated value of which is treated as a schedule for interchange accounting purposes". (Source - Dynamic Transfer Issue Paper, California ISO, November 30, 2009). In other words, as the need for electricity by the residents of Glendale increases or decreases, or if generation is affected by sudden decrease in wind for wind turbines or the clouds pass over solar panels causing a loss of generation, the output of the power blocks can be adjusted very quickly to accommodate these types of inadvertent changes without causing drop in voltage causing damage to electronic devices or dip in lighting.

The existing facility uses static scheduling where fixed amounts of energy/capacity are scheduled a day-ahead or each hour. GWP then contracts out the services necessary to perform real-time dispatching and interchange adjustments to obtain electricity from off-site resources in order to manage energy demands, since the current units are not capable of provided dynamic scheduling capability. This service is expensive to the City and the Proposed Project would allow the City to perform real-time dispatching and interchange adjustments themselves.

The City would meet system load requirements with a combination of long term contracts and spot market imported power, primarily renewable energy resources, and local generation to meet peak demand and ancillary services.

3.4.1 Facility Staffing

Existing employee levels and delivery and service requirements are not anticipated to change after completion of the Project. Therefore, any changes in power plant traffic after commissioning are expected to be minimal. The City would employ a staff of approximately 50 full-time permanent employees to operate and maintain the facility. Staff would include power plant: operators, shift supervisors, administrative personnel, mechanics, instrumentation, and controls technicians, electricians, engineers, and a chemist (Table 3-4).

The power plant operators and shift supervisors, in 4 rotating shifts, would work 12 hour shifts to monitor and operate the plant year-round. All other staff would work on a 9/80 work schedule, with every other Friday off.

Table 3-4 Grayson Power Plant Staffing after Repowering

Title	Total Employees	Employees per Shift
Plant Superintendent	1	
Operations Supervisor	1	
Maintenance Supervisor	1	
Instrumentation & Controls Supervisor	1	
Shift Supervisor	4	1
Environmental Engineer	1	
Control Operator	16	4
Operator	4	1
Senior Mechanic	2	
Mechanic	6	
Senior Instrumentation & Controls Technician	2	
Instrumentation & Controls Technician	2	
Electrical Supervisor 1	1	
Electrician	2	
Chemist	1	
Electrical Engineer	1	
Mechanical Engineer	2	
Administration	2	
Total Employees:	**50**	**6**

3.4.2 Operating Modes and Statistics

The Project configuration would allow the repowered Grayson Power Plant to generate power across a wide and flexible operating range that would serve both peak and intermediate loads with the added capabilities of rapid startup, significant turndown capability (ability to turn down to a low load), and fast ramp rates.

The increased requirement for California's renewable energy portfolio requires a stable energy source to support and firm up the intermittent characteristics of photo voltaic and wind resources. The Project's ability to provide rapid startup, operate over a wide range of load, and the ability to quickly adjust load are necessary for the City to be able to integrate additional renewable electric energy sources to meet California's Renewable Portfolio Standards. By being able to deliver flexible operating characteristics across a wide range of efficient generating capacity, at a relatively consistent and superior heat rate, and replacing older, less efficient generation both in the Los Angeles basin and well as outside the Los Angeles basin, the Project would help lower the overall greenhouse gas emissions resulting from electrical generation for the City.

Each combined cycle power block would have the ability to generate power from approximately 21 MW (one-on-one combined-cycle gas turbine minimum load state) to approximately 71 MW (one-on-one combined-cycle gas turbine maximum load state) net at ambient average site conditions. The simple cycle combustion turbines are expected to be capable of a turndown allowing continuous operation at 28 percent or less of full load. The

combined cycle units are expected to be capable of a turndown allowing continuous operations at 30 percent or less of full load.

While the Grayson Power Plant's annual electrical production for the years 2021 and beyond cannot be forecasted with certainty, because of the efficiency of the Project's equipment and given the operating characteristics as described above, the Project is expected to have a plant capacity factor between 30 to 60 percent. The maximum available generation possible from the facility based on average annual conditions is estimated to be approximately 2.2 gigawatt hours per year (based on an annual site average facility base load megawatt rating of a net 60 MW per simple cycle unit and a net 71 MW per combined cycle unit, 94 percent availability and 8,760 hours per year). Actual generation is expected to be less as the simple cycle units would have a capacity factor much less than the 94 percent availability and both of the combined cycle units would operate at the same time primarily during the late spring through early fall months.

3.4.3 Operating Statistics

The actual capacity factor and unit operating profiles in any one month or year would depend on several factors, such as: real-time customer demand, load growth, long term power supply agreements, spot market conditions, renewable energy supplies and integration requirements, generating asset efficiencies, retirements and replacements, the level of remote and local generating asset planned and unplanned outages, and transmission outages and de-rates.

3.4.4 Offline

Planned maintenance outages would be performed during periods of low demand, which is normally during off-peak periods. Generally, only one major power block planned outage would be performed in a month. All simple cycle power blocks would be kept available during a combined cycle planned outage.

3.4.5 Plant Security

The existing City Utility Operations Center security system would be retained with additional video cameras surveillance provided as part of the Project. The existing system includes a combination of perimeter walls, fences, gates, and doors, security guards, video camera surveillance, and recording. Prior to commencing with construction or operations, a site-specific security plan for the construction and operations phase would be developed and maintained at the site. The plans would be available for review at the site during compliance inspections.

The control operation building operates 24 hours a day, seven days a week. Visitors after hours are required to check in with the operations shift supervisor on duty using the intercom at the main gate. The visitors are identified using the remote camera and are required to show their identification before entrance is granted.

3.5 FACILITY RELIABILITY

This section discusses the expected facility availability, equipment redundancy, fuel availability, water availability, and Project quality control measures.

3.5.1 Facility Availability

The Project would be designed to support dispatch service in response to customer demands for electricity. The Project would be designed for an expected operating life of 30 years. Reliability and availability projections are based on this operating life. Operation and maintenance procedures would be consistent with industry standard and best practices to maintain the operating life status of plant components.

The projected Availability Factor for the Project, which is the time the plant is available for dispatch (i.e., time that the unit is not out for routine maintenance) is estimated to be approximately 94 percent, which is the percent of time that a unit is available for operation, whether at full load, partial load, or standby.

3.5.2 Redundancy of Critical Components

The following subsections identify equipment redundancy as it applies to the Project availability. Major equipment redundancy is summarized in Table 3-5.

Table 3-5 Major Equipment Redundancy

Description	Number per Unit and Percent Capacity	Notes
Combustion Turbine Generator Simple Cycle	One combustion turbine generator per unit	Each simple cycle units are independent of the operation of the other simple cycle units and the combined cycle units.
Combined-cycle combustion turbine generator / heat recovery steam generator Units in 1 x 1 configuration	One combustion turbine generator / heat recovery steam generator per unit	Each combined cycle unit is independent of the operation of the other combined cycle unit and simple cycle units. Combined cycle steam turbines include bypass system to the condenser allowing each combustion turbine generator / heat recovery steam generator train to operate for a short duration with the steam turbine out of service. No cross connection of combined cycle unit steam systems. Electric Boiler for maintaining steam turbine generator seals when steam turbine generator is off line.
Steam Turbine Generator	One steam turbine generator for each combined cycle unit	One steam turbine generator per combined cycle unit, designed to allow short term operation of combustion turbine generator with steam dump to the condenser
Heat Recovery Steam Generator High	2-100 percent capacity per heat recovery steam	One spare per heat recovery steam generator

Description	Number per Unit and Percent Capacity	Notes
Pressure feed water pumps	generator	
Heat Recovery Steam Generator Low Pressure feed water pumps	2-100 percent capacity per heat recovery steam generator	One spare per heat recovery steam generator
Blowdown Transfer Pumps	2-100 percent capacity per heat recovery steam generator	One spare per heat recovery steam generator
Vacuum pumps	2-100 percent capacity per block	One spare per Steam Turbine Condenser
Condensate pumps	2-100 percent capacity per block	One spare per Steam Turbine Condenser
Water-cooled condenser	1-100 percent capacity for each combined cycle unit	One condenser per unit. Condenser must be in operation for combined cycle operation or operation of combustion turbine generator in steam turbine bypass mode
Cooling Tower	1-100 percent per combined cycle unit	Separate two cooling tower for each combined cycle unit. Loss of one fan would still allow up to 85 percent unit load as long as circulator pumps are on.
Cooling Water Circulation Pumps	2-60 percent capacity per cooling tower	Two redundant pumps serving as the source of cooling water for steam turbine condenser.
Auxiliary Cooling Water booster pumps	2 – 100 percent capacity per combined cycle unit	Two redundant pumps serving as the source of cooling water for auxiliary equipment heat loads, including the closed cooling water system.
Closed Loop Cooling System Heat Exchanger (auxiliary cooling water)	1 – 100 percent capacity per combined cycle unit	For heat rejection duties with high temperature heat transfer surfaces requiring less scaling water (e.g. lube oil coolers and totally enclosed water-to-air cooled generators)
Ammonia Flow Control Unit Dilution Air Fans	2-100 percent capacity per combustion turbine generator	One spare fan for each of the four combustion turbine generators
Air Compressors	3 – 100 percent	Instrument and service air supply, includes redundant wet air receiver, air dryers and dry air accumulators.
Fuel gas compressors per combustion turbine generator	3-100 percent capacity per pair of simple cycle combustion turbine generators and per pair of combined cycle combustion turbine generators	One gas compressor for each simple cycle combustion turbine generator with one spare and one gas compressor for each combined cycle combustion turbine generator with one spare
Demineralizer system	2 – 60 percent capacity trains 2 – 75,000-gallon water storage tanks	Purification units would each have the capacity to produce half of the high purity water requirement for the entire plant (injection water, feedwater makeup, etc.) plus two days storage of high purity makeup water. Connections and space for temporary water treatment trailer would be included in the design.

3.5.2.1 Simple Cycle Power Blocks

Each simple cycle unit would operate independently. The two units would utilize a single Power Distribution Center housing the generator breakers and electrical controls.

3.5.2.2 Combined Cycle Power Blocks

Each combined cycle unit would operate independently in 1 x 1 train (one combustion turbine generator, one heat recovery steam generator, one steam turbine generator, and one steam condenser in each train). The steam systems would not be interconnected.

Each combined cycle unit would be driven by a combustion turbine generator; with each combustion turbine generator providing approximately 70 percent of the total combined-cycle electrical output and the heat used to raise steam for each associated steam turbine generator. Power from the steam turbine generator subsystem would contribute approximately 30 percent of the total combined-cycle electrical output. Major equipment redundancies are listed in Table 3-5 above.

3.5.2.3 Combustion Turbine Generator Subsystems

The combustion turbine generator subsystems include the combustion turbine, inlet air filtration and inlet air cooling, combustion turbine and generator lubrication oil systems, hydraulic control oil system, hydraulic system, starting system, gas fuel supply system, generator and excitation systems, and turbine control and instrumentation. The combustion turbine would produce thermal energy through the combustion of natural gas and the conversion of the thermal energy into mechanical energy through rotation of the combustion turbine that drives the compressor and generator. Power augmentation, other than the inlet air cooled system via the evaporative coolers, would not be used. The combined cycle generator would be cooled by totally enclosed water-to-air coolers. Combustion turbine control and instrumentation (interfaced with the Plant Control System) would cover the turbine governing system, and the protective system.

3.5.2.4 Heat Recovery Steam Generator Subsystems

The heat recovery steam generator systems include the heat recovery steam generator, catalytic emissions control systems and ammonia injection system, stack with Continuous Emissions Monitoring System and boiler blowdown.

The blowdown system is designed to prevent the levels of residual dissolved solids in the heat recovery steam generator water from building up. It is also designed to drain the superheat coils during startup to prevent blocking of the coils with condensate that may accumulate during the startup sequence.

All steam generation and boiler feed water equipment is designed for specific maximum pressure operation and would have pressure safety relieving devices to prevent over pressurization during contingent operation. The system is designed such that these devices are not activated during normal operation.

3.5.2.5 Steam Turbine Generator Subsystems

The steam turbine expands high pressure high temperature steam to low pressure low temperature steam to convert the thermal energy of the steam to mechanical energy (shaft rotation). The rotation of the steam turbine generator shaft drives the generator which converts mechanical energy to electrical energy.

The steam turbine generator basic subsystems include the steam turbine and auxiliary systems, turbine and generator lubrication oil systems, generator coil cooling, generator/exciter system, turbine control system, and associated instrumentation. The generator would be totally enclosed water–to-air cooled generator.

The lubricating oil for the steam turbine and the generator bearings, including the totally enclosed water-to-air cooled generator, is water cooled through a closed loop cooling system.

3.5.2.6 Plant Control System

The Plant Control System would be a redundant microprocessor-based system that would provide the following functions:

- Control the heat recovery steam generators, steam turbine generators, combustion turbine generators, and other systems in response to unit load demands (coordinated control).
- Provide control room operator and engineering interface (HMI).
- Monitor plant equipment and process parameters and provide this information to the plant operators in a meaningful format.
- Provide visual and audible alarms for abnormal events based on field signals or software-generated signals from plant systems, processes, or equipment.

The Plant Control System would have a functionally distributed architecture comprising a group of similar redundant processing units; these units would be linked to a group of operator consoles and an engineer work station by redundant data highways. Each processor would be programmed to perform specific dedicated tasks for control information, data acquisition, annunciation, and historical purposes. Because they would be redundant, no single processor failure can cause or prevent a unit trip.

The Plant Control System would interface with the control systems furnished by the steam turbine generator, heat recovery steam generator, and fuel gas compressors to provide remote control capabilities, as well as data acquisition, annunciation, and historical storage of operating information.

The system would be designed with enough redundancy to preclude a single device failure from significantly affecting overall plant control and operation. Consideration would be given to the action performed by the control and safety devices in the event of control circuit failure. Controls and controlled devices would move to the safest operating condition upon failure.

Plant operation would be controlled from the operator panel in the control room. The control panel would consist of individual, cross-connected monitor/keyboard consoles, one engineering workstation, and one historian workstation.

Each monitor/keyboard console would be an independent electronic package so that failure of a single package would not disable more than one monitor/keyboard. The engineering workstation would allow the control system operator interface to be revised by authorized personnel.

The Plant Control System shall be designed to facilitate operation of the units under automatic generation control for some or all the units simultaneously at the Grayson Power Plant.

3.5.2.7 Recycled Water-Cooled Condenser System

Exhaust steam from steam turbine generators would be condensed in water-cooled condensers. A two-mechanical draft cooling tower with two motor driven vertical wet-pit circulating water pumps and associated piping and valves, would provide water to the condenser and cool the return water by rejecting heat to the atmosphere through evaporation in the cooling tower. The cooling tower makeup would be from recycled water. The low-pressure steam from the steam turbine exhausts is cooled to a temperature at which point it condenses back into water (condensate). It is collected in the condenser hotwells. Condensate pumps would return the condensate from the hotwell back to the heat recovery steam generators for reuse.

The condensate system transfers condensate from condenser hot wells through the condensate polishers, the condensate pre-heater, and into the deaerator.

3.5.2.8 Cooling System

Each water-cooled power block (combined cycle units only) would have a closed-loop cooling system that would provide cooling water for various plant equipment, such as the combustion turbine generator and steam turbine generator coolers, combustion turbine generator and steam turbine generator lubrication oil coolers and boiler feed water pumps. The heat rejection for this closed-loop system would be through a closed loop heat exchange with cooling tower cooling water.

3.5.2.9 Heat Recovery Steam Generator Feed Water System

The heat recovery steam generator feed water system transfers boiler feed water from the deaerator to the heat recovery steam generators.

The system would consist of two (2) 100 percent capacity high pressure feedwater pumps and two (2) 100 percent capacity low pressure feedwater pumps to supply condensate to the respective high pressure and low pressure economizer for each heat recovery steam generator.

Each high-pressure boiler feedwater pump would be multistage, horizontal, and motor-driven and would include regulating control valves, minimum flow recirculation control, and other associated piping and valves.

3.5.2.10 Demineralized Water System

The demineralized water system would consist of two 60 percent capacity demineralizer trains from an on-site water treatment system consisting of multimedia filters, ultrafiltration, a reverse osmosis unit, and an electro-deionization system with two 60 percent capacity trains. The system would also have two 75,000-gallon storage tanks.

3.5.2.11 Power Cycle Water Makeup and Storage

The power cycle water makeup and storage subsystem provides demineralized water storage and pumping capabilities to supply high-purity water for steam cycle condensate makeup, for the simple cycle combustion turbine generator inlet air cooling system and Inlet Spray Inter-cooling power augmentation systems and for NOx control, for the closed-loop cooling water system, for the combined cycle generators and oil coolers, for combustion turbine generator water wash, and for chemical cleaning operations. The major components of the system are two demineralized water storage tank and two 100 percent capacity, horizontal, centrifugal, cycle makeup water pumps.

3.5.2.12 Compressed Air System

The compressed air system would be designed to supply service and instrument air for the facility. Dry, oil-free instrument air would be provided for pneumatic operators and devices throughout the plant. Compressed service air would be provided to appropriate areas of the plant at utility stations consisting of a ball valve and quick disconnect fittings.

The instrument air system would be given demand priority over the service air system. A backpressure control valve would cut off the air supply to the service air header so as to maintain the minimum required instrument air pressure.

Three (3), 100 percent capacity, oil-free, rotary screw package air compressors, which would supply compressed air to the service and instrument air systems. Two (2), 100 percent capacity, heatless desiccant air dryers would be provided to dry the service and instrument air.

3.5.3 Fuel Availability

The project would utilize only natural gas provided by SoCalGas. An existing SoCalGas high pressure pipeline serving the existing Grayson Power Plant would provide natural gas at pressures ranging from 250 pounds per square inch gauge to 550 pounds per square inch gauge.

Maximum fuel demand during full load operations, including Unit 9 is approximately 60 million cubic foot per day. The existing pipeline is capable of delivering this volume of natural gas to the Grayson Power Plant. SoCalGas has available and has the capabilities to provide up to 64 million cubic feet of natural gas per day through a single meter station to be located within the Utility Operations Center site.

3.5.4 Water Availability

The Project would use, on average, 860 acre-feet per year of recycled water provided from the Los Angeles – Glendale Water Reclamation Plant for power plant process water. GWP would supply potable water for any human contact purpose including drinking, sanitation, safety showers, service water, and fire protection. Will Serve letters from GWP for both recycled and potable water are included in Appendix B.

3.5.5 Sewer Availability

The Project would discharge approximately 270 acre-feet per year of wastewater consisting of process and sanitary wastewater, to the City of Glendale's sanitary sewer system, which in turn goes to the Los Angeles-Glendale Reclamation Plant. Connection from the facility for sanitary wastewater would be made to an on-site sewer manhole that connects to the existing 24-inch sanitary sewer main located adjacent to the facility in Fairmont Avenue. For process wastewater the connection would be to the existing facility process wastewater discharge system that discharges wastewater into an existing sewer manhole located across the Verdugo Wash.

3.5.6 Project Quality Control

The objective of the quality control program is to ensure that all systems and components have the appropriate quality measures applied, whether during design, procurement, fabrication, construction, or operation. The goal of the quality control program is to achieve the desired levels of safety, reliability, availability, operability, constructability, and maintainability for generating electricity.

The required quality assurance for a system is obtained by applying controls to various activities, according to the activity being performed. For example, the appropriate controls for design work are checking and review, and the appropriate controls for manufacturing and construction are inspection and testing. Appropriate controls would be applied to each of the various activities for the Project.

3.5.6.1 Project Stages

For quality assurance planning purposes, the Project activities have been divided into the following stages that apply to specific periods during the Project:

- **Conceptual Design Criteria.** Activities such as definition of requirements and engineering analyses.
- **Detail Design.** Activities such as the preparation of calculations, drawings, and lists needed to describe, illustrate, or define systems, structures, or components.
- **Procurement Specification Preparation.** Activities necessary to compile and document the contractual, technical, and quality provisions for procurement specifications for plant systems, components, or services.
- **Manufacturer's Control and Surveillance.** Activities necessary to ensure that the manufacturers conform to the provisions of the procurement specifications.
- **Manufacturer Data Review.** Activities required to review manufacturers' drawings, data, instructions, procedures, plans, and other documents to ensure coordination of plant systems and components, and conformance to procurement specifications.
- **Receipt Inspection.** Inspection and review of product at the time of delivery to the construction site.
- **Construction/Installation.** Inspection and review of storage, installation, cleaning, and initial testing of systems or components at the facility.
- **System/Component Testing.** Actual operation of generating facility components in a system in a controlled manner to ensure that the performance of systems and components conform to specified requirements.
- **Plant Commissioning and Plant Acceptance Testing.** Operation and checkout of each unit with integrated operation of the plant systems. Testing of the integrated plant to ensure that the unit meets it performance requirements for emissions, output, efficiency, and functional requirements.

3.5.6.2 Quality Control Records

The following quality control records would be maintained for review and reference:

- Project instructions manual
- Design calculations
- Project design manual
- Quality assurance audit reports
- Conformance to construction records drawings
- Procurement specifications (contract issue and change orders)
- Purchase orders and change orders
- Project correspondence

For major equipment purchases, a list of qualified suppliers would be developed before proposals are accepted and contracts are awarded and requests for substitution with an "approved equal" would require submittal of justification for the substitution and approval of the City. The evaluation would consider equipment reliability, permit ability, manufacturer's production capabilities, past performance, quality assurance program, operational cost, and history of operations.

During demolition and construction, field activities are accomplished during the last four stages of the Project: receipt inspection, construction/installation, system/component testing, and plant operations. The construction contractor would be contractually responsible for performing the work in accordance with the quality requirements specified by the contract.

A plant operation and maintenance program, typical of a project this size, would be implemented by the Project to control operation and maintenance quality. A specific program for the Project would be defined and implemented during initial plant startup.

3.6 THERMAL EFFICIENCY

3.6.1 Thermal Efficiency

The gross annual average thermal efficiency that can be expected from the configuration specified for the Project combined cycle units is approximately 50 percent. This level of efficiency is achieved when a combined cycle unit is operated at full load.

The gross annual average thermal efficiency that can be expected from the configuration specified for the Project simple cycle units is approximately 37.6 percent. This level of efficiency is achieved when a simple cycle unit is operated at full load. Other types of operation, particularly those at less-than-full gas turbine output, would result in slightly lower efficiencies.

The Project design, however, achieves a high level of efficiency across a wide range of generating capacity. The basis of the Project's operations would be system dispatch within the Glendale power generation and transmission system. It is expected that the Project's simple cycle units would be primarily operated for non-spinning reserves and for meeting peaking requirements. One combined cycle unit would generally always be in operation to provide regulation, balancing renewable imports, and spinning reserve. As system loads increase with warming weather, the second combined cycle unit would be expected to also operate for the same purposes.

Plant fuel consumption would depend on the operating profile of the power plant. It is estimated that the maximum fuel consumed by the Project would be approximately 2,100,000 standard cubic feet per hour at summer maximum demand conditions.

3.7 FACILITY CLOSURE

Facility closure can be temporary or permanent. Temporary closure is defined as a facility shut down, including all turbine generators for a period exceeding the time required for normal maintenance, including closure for overhaul or replacement of one or more combustion turbines. Causes for temporary closure include a disruption in the supply of natural gas or damage to the plant from earthquake, fire, storm, or other natural acts. Maintenance or shut down of one or more turbines for a variety of reasons is not considered temporary closure. Permanent closure is defined as a cessation in operations with no intent to restart operations because of plant age, damage to the plant beyond repair, or other reasons. The following sections discuss temporary and permanent facility closure.

3.7.1 Temporary Closure

For a temporary facility closure, security of the facilities would be maintained on a 24-hour basis, and City officials and other responsible agencies would be notified. Depending on the length of shutdown necessary, a contingency plan for the temporary cessation of operations would be implemented. The contingency plan would be conducted to ensure conformance with all applicable LORS and the protection of public health, safety, and the environment. The plan, depending on the expected duration of the shutdown, may include the draining of all chemicals from storage tanks and other equipment and the safe shutdown of all equipment.

Where the temporary closure includes damage to the facility, and there is a release or threatened release of regulated substances or other hazardous materials into the environment, procedures would be followed as set forth in a Risk Management Plan and a Hazardous Materials Business Plan.

Procedures would include methods to control releases, notification of applicable authorities and the public, emergency response, and training for plant personnel in responding to and controlling releases of hazardous materials. Once the immediate problem is solved, and the regulated substance/hazardous material release is contained and cleaned up, temporary closure would proceed as described above for a closure where there is no release of hazardous materials.

3.7.2 Permanent Closure

The expected operating life of the generation facility is 30 years, though it may be capable of being operated beyond this expected life, depending on actual operating conditions and demand on the facility. Whenever the facility is permanently closed, the closure procedure would follow a plan that would be developed as described below.

The removal of the facility from service, or decommissioning, may range from "mothballing" to the removal of all equipment and appurtenant facilities, depending on conditions at the time.

Because the conditions that would affect the decommissioning decision are largely unknown at this time, these conditions would be presented to the responsible agency when more information is available and the timing for decommissioning is more imminent.

To ensure that public health and safety and the environment are protected during decommissioning, a decommissioning plan would be submitted to the responsible agency for approval prior to decommissioning. The plan would address the following:

- Proposed decommissioning activities for the facility and all appurtenant facilities constructed as part of the facility.
- Conformance of the proposed decommissioning activities to all applicable LORS and local/regional plans.
- Activities necessary to restore the site if the plan requires removal of all equipment and appurtenant facilities.
- Decommissioning alternatives other than complete restoration.
- Associated costs of the proposed decommissioning and the source of funds to pay for the decommissioning.

In general, the decommissioning plan for the facility would attempt to maximize the recycling of all facility components. If possible, unused chemicals would be sold back to the suppliers or other purchasers or users. All equipment containing chemicals would be drained and rendered inert to ensure public health and safety and to protect the environment. All nonhazardous wastes would be collected and disposed of in appropriate landfills or waste collection facilities. All hazardous wastes would be disposed of according to all applicable LORS.

The site would be secured 24 hours per day until completion of all decommissioning activities. If equipment is mothballed in place, the site would continue to be secured 24 hours per day indefinitely.

L119

From: Jackie Gish
To: Krause, Erik
Cc: Marie Freeman
Subject: DEIR Comments
Date: Tuesday, September 29, 2020 3:32:29 PM
Attachments: Gish Comment Letter final.docx
Emissions from flares compared to Section 4.2.xlsx
Gas composition as function of time.xlsx

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Mr. Krause,

L119-1 Attached are my detailed comments on the Biogas Renewable Generation Project DEIR as well as two spreadsheets which I refer to in my comments. Many of the comments were a group effort from residents of Glenoaks Canyon, who spent a lot of time reviewing the document.

We look forward to hearing responses to our concerns.

Thank you,

Jackie Gish
Glenoaks Canyon Resident

DEIR For Scholl Biogas Project

L119-2 First of all, I have been a resident of Glenoaks Canyon for 30 years. I worked in the aerospace industry as a technical manager and program manager and am currently the "manager" for the Glenoaks Canyon response to this DEIR.

Our team generated comments, questions and concerns on most of the sections of the DEIR. They are summarized below, but first our highest priority concerns:

- **Overall objective:**
  - The overall project objective as stated in the DEIR is to "beneficially use the methane-rich landfill gas (LFG) generated by SCLF as fuel to generate 100 percent renewable electrical energy on-site." L119-3
  - Why is there no statement of picking the best project from the point of view of health and safety for residents and the environment? Why does GWP care where the electrical energy is generated? This project is far from a non-polluting project and is planned to be built in a fire and earthquake prone area.
  - There is a possibility that eventually landfill gas burning may not be classified as "renewable energy". How would this affect the project?
- **The quality of the report:**
  - Many of the sections were not appreciably updated since the MND and use old or conflicting data, including some critical errors: L119-4
    - Gas flow this year is closer to 6000 - 6200 scfm (see discussion under project below) and has not been as low as 5000 scfm since 2016 or so.
    - Greenhouse Gas emissions in Section 2.6 and Appendix F disagree (see discussion under Greenhouse Gas Emissions below).
    - Flare emissions in the report are also much lower than the 2019 numbers.
  - There are many other less major errors, but the document really needs to be edited and corrected.
- **Concerns about the full-time flaring occurring now at Scholl:**
  - There was no EIR done before the full-time flaring was started, presumably because the pollution near Grayson necessitated an immediate response.
  - Current NOx emissions from the flares in 2019 is 152#/day (see attached spread sheet entitled "Emissions from flares compared to section 4.2, all data from AQMD website), far exceeding the "significance" threshold of 55#/day. Is Glendale currently paying for offsets for this emission? If so, how much? L119-5
  - When does Glendale plan to buy the new flares to meet state regulations? What are the costs for new flares to consume all landfill gas?
  - Now that the flares are being used 24/7 for all the landfill gas, has there been an assessment of the fire danger by GWP, GFD or the city of Glendale? Should any of the mitigation measures proposed in Section 4.14 or any others be used now?
  - It should also be noted that the Health Risk Assessment dated April 23, 2019 has maximum potential toxic emissions inventory numbers which are substantially lower for many species than the 2019 emissions from the flares.
- **The discussion of Alternatives is inadequate:**
  - There should have been a quantitative comparison of the alternatives and the baseline project prior to picking the baseline project. Why was this not done? L119-6

More detailed discussion of concerns/questions/comments covering most of the DEIR sections:

- **The project:** *There are many details we want to know that are not presented at all. These include the following:* L119-7
  - Overall layout of the new equipment, including artist's concept, both in plan view as well as in the vertical direction for both the present time as well as when the landfill closes when full.
  - What are the future plans for the landfill and how do they relate to the proposed project? L119-8
  - Why were these engines chosen? What are the advantages and disadvantages relative to turbines? L119-9
  - Why are the engines not running 24/7 or closer to that? Why is there a turn-on/off every day for every engine and an assumed maintenance of one engine every day for 10 hours? Do the engines only run about 80%? If this is true then won't there will be a lot of flaring? L119-10
  - The flow rate assumed in the report of 5000 scfm (standard cubic feet per minute) was probably fairly accurate in 2016, but the current flow rate is 6000 or more scfm (data provided by Sanitation District – current flow rate is around 7000 cfm [cubic feet per minute], which is 6000 or 6200 scfm). Because the engines can only utilize 5500 scfm (combined for 4 engines), **some gas will have to be flared at all times even if the engines run 24/7.** If 10% natural gas is added, this makes the amount of flaring even higher. Why was recent data not used? This will force Glendale to replace some flares soon whether or not the city wants to. L119-11
  - Because of the relatively low methane content of the landfill gas (about 34%), the "10%" natural gas actually supplies nearly 25% of the overall power of the project. Without this natural gas, the project would produce less than 9.5 MW. Is it GWP's intention to have 10% natural gas at all times (even though the engines cannot handle the full flow rate as shown above)? Why is the natural gas needed? L119-12
  - What are the baseline conditions for the design in terms of % methane? Have there been calculations/projections done about the change of both flow rate and % methane over the course of 20+ years? How will the diversion of organics from landfills affect these numbers? L119-13
  - What is being done with the various waste products from removal of sulfur and siloxanes and other impurities? L119-14
- **Aesthetics:** The 60,000-gallon water tank and the 40-foot tall engines will be visible from surrounding residential neighborhoods and will likely be visible from trails if the area reverts to a recreation area. There is no discussion of how the project will affect the aesthetics after the landfill is closed. L119-15
- **Air Quality:** *Pollution from the Project will exceed the South Coast Air Quality Management District's (SCQAMD) thresholds for four contaminants, but there is no discussion of mitigation and using the best available control technology (BACT). Instead the DEIR assumes that GWP will get priority reserve credits to eliminate the pollutants on paper. Measurements of the pollutants are made from monitors that are not near the landfill. The DEIR does not discuss carcinogenic pollutants such as dioxins and furans.* L119-16
  - **GWP cannot "mitigate" pollution with SCAQMD Priority Reserve Offset Allocations.** The DEIR proposes to mitigate the offending pollutants with SCAQMD Priority Reserve Offset Allocations. But credits/offsets do not reduce pollution. The fact is that NOX, CO, VOC, and PM2.5 from the power plant exceed the SCAQMD thresholds. People's health is not impacted less because the project receives offset credits. Based on projections, pollution levels associated with the proposed project are worse than those resulting from the current full-time flaring and even worse when compared to the new flares. Also, in the DEIR, L119-17

L119-17 **Priority Reserve Credits are presumed certain.** From what we understand, GWP must apply for Priority Reserve credits, and the SCAQMD may note that the power generation was **simply relocated from Grayson to Schol**l. We need an explanation of the logic behind the Priority Reserve Offset Allocation.

- **No mitigation plans are specified/explained.** No specific plans are mentioned for mitigating any of the pollutants.
  - We are concerned about the air pollution including the estimated release of carbon monoxide (900 pounds of daily), particulate matter (PM 2.5 and PM 10) and oxides of nitrogen (NOx). These pollutants have adverse impacts on public health.
  - We are also concerned about toxic air contaminants, such as benzene, trichloroethylene (TCE), and other volatile organic compounds (VOCs) that should be disposed of to the extent it is technologically possible.

L119-18

  - The DEIR repeatedly mentions that it intends to use "BACT" (best available control technology) or that the emissions were "calculated based upon SCAQMD BACT standards", but the report does not specify what those standards are. We understand that a DEIR should describe the BACT methods that the project plans to use. We understand that BACT can be quite complicated requiring a combination of methods. <u>At a minimum, the DEIR should mention the assumptions it used, e.g., which BACTs were assumed to have what effect.</u> Also, the same numbers for BACT emissions are in this DEIR as were in the MND two years ago. Are there any BACT improvements?
- **No discussion of the release of products of incomplete combustion**
  - There were no discussions of the release of products of incomplete combustion other than carbon monoxide, (usually present), such as dioxins and furans. Dioxins, for example, are highly persistent toxic compounds that stay in the food chain and environment for a long time. Burning solid waste is one of the most prominent sources of dioxin.

L119-19

  - Are any other products of incomplete combustion released in the proposed biogas to electricity project? if so, why were they omitted from the analysis?
- **No air quality monitoring for nearby neighborhoods**
  - The closest monitoring station to the proposed Project site is located in Pasadena, approximately four miles southeast of the landfill. Data for pollutants that are not monitored at this station, such as SO2, PM10, and lead, are taken from the Los Angeles-North Main Street monitoring station, six miles south of the proposed Project site.

L119-20

  - Much of the analysis in the Air Pollution section depends on the findings from the monitoring stations, including existing air quality. Given that there are tens of thousands of residents in Glendale, Pasadena, and Los Angeles living within 4 and 6 miles from the site, air quality analysis should be done by monitoring stations near the proposed project site.
  - Is it possible to perform an air quality analysis for a local neighborhood using actual monitors instead of computer models?
- What are the best practices for the landfill to dispose of contaminants removed at various stages of treatment? For example, at the primary treatment stage, water, particulates, etc. are removed and the air is cooled and compressed, and at the secondary treatment level siloxanes, sulfur, NMOC's, etc. may be removed. What happens to them? What happens to the pollutants captured by the catalyst?

L119-21

L119-22
- Flare pollution is used as the baseline, but seemed to use AQMD data from 2018 when flares were only used about 2/3 of the year instead of 2019 when flares were used 100%. Please see the attached spreadsheet "Emissions from flares compared to Section 4.2".

L119-23
- **Biological Resources:** *The potential biological impact is missing key species. In addition, these hills serve as a wildlife corridor which could be disrupted by the project.*
- **Energy:** *Yes, the project will utilize the energy which is currently being flared. But there may be alternatives which can utilize the gas with less impact on the environment.*

L119-24
  - Comparison of the project to the current flares shows that the project produces energy rather than generating no energy. But if one compares the project to what was done prior to the shutdown at Grayson (or Alternative 4), the improved energy is marginal at best and possibly worse due to high energy costs during construction and use of natural gas to supplement.
  - In addition, there will be more people operating the plant with the new equipment than are currently operating the flares.
- **Geology and Soils:** *The Project will be located atop a mountain which sits near a potential 6.7 earthquake fault. Seismic waves on a mountain can be amplified 4 or 5 times those of field waves, and the report gives insufficient mitigation measures for threats to power equipment, buildings, tanks, and pipelines. Nor does the report present emergency back-up systems to mitigate damage from earthquakes or fire.*

L119-25
  - The proposed Biogas Project would be located approximately 0.4 mile from the Verdugo Hills Fault which has been ranked by HAZUS as the fifth most potentially damaging earthquake fault in Southern California.
  - The Scholl Canyon landfill was constructed without a composite liner or an impermeable membrane and this issue has never been remedied.
  - Igneous and metamorphic rocks are present beneath the Scholl Canyon Landfill and are an environmental hazard because they are highly fractured and allow substances of concern to percolate down the regional drainage into the groundwater.
  - The proposal to build a power plant in the landfill area that is already fraught with severe unresolved environmental hazards would be ill-conceived.
- **Greenhouse Gas Emissions:** *The GHG numbers for the proposed project in Section 4.6 are inconsistent with the numbers in Appendix F. Using the numbers from Appendix F and the baseline flare numbers from Section 4.6 shows that the GHG emissions may increase more than the significance threshold of 10,000 metric tons of carbon dioxide equivalent per year. We have no idea where the proposed project numbers in Section 4.6 come from.*

L119-26
  - The section 4.6 on Green House Gas Emissions states that the baseline scenario of flaring produces **43,621** metric tons of CO_2e per year and that the proposed plant operation will produce a total of **48,427** metric tons CO_2e per year. Thus, the DEIR claims that there is a net increase of only **4,806** metric tons per year, which is below the SCAQMD significance threshold of **10,000** metric tons of CO_2e per year (for an industrial project). Therefore, the DEIR concludes that no mitigation measures are needed.
  - A question arises because the emissions for the project in section 4.6 and its corresponding Appendix F (same as MND section F) are not in agreement. While section 4.6 assumes greenhouse gas emissions of **48,427 metric tons of CO_2e** per year for the new power plant, the corresponding Appendix F (Greenhouse Gas (GHG) Emission Inventory) actually projects emissions of **57,467 CO_2e (57,222 for operation + 246 for occupants)**, a substantially higher number. The difference between the new project and the baseline would be 13,846 metric tons, above the 10,000 SCAQMD threshold.

- This discrepancy could possibly be explained from an estimated maintenance and repair downtime of 15.4% (1- 48,427/57,222), which is not mentioned in section 4.6 or Appendix F. However, during such downtime, flares would serve as backup devices as explained in the section – which we know create similar amount of GHG – 90% as much (43,621/48,427 = 90%). Thus, we cannot reach the projected 48,427 metric tons in section 4.6 from 57,467 metric tons in Appendix F just through downtime.

L119-26

- In addition, if run time or some other effect is creating this difference, then one would think that the air quality numbers would also differ from the MND numbers, but they don't.
- There must be an alternative explanation. So please explain the difference of these numbers in detail.
- The total gas flow rate is also different than assumed (see explanation under Air Quality) and the flare numbers may also be different than assumed, so this entire section might be off by a lot, likely underestimating Greenhouse Gas Emissions significantly.

- **Hazards and Hazardous Materials:** *Hazards need to include the effect of earthquakes and fire on the hazards listed, such as the lube oil and waste oil tanks, and the natural gas line.*
  - There are elderly care facilities and child care centers in Eagle Rock, much closer than the 5 to 8 miles listed in the section.
  - Even watered plants tend to burn in an intense fire.
  - Nearest fire station is in LA, not Glendale.
  - Hazards during construction (in addition to ones listed) include:

L119-27

    - Re-piping for landfill gas and possibility of release of landfill gas
    - Earthquake or wildfire combined with materials there for construction
  - Hazards during operation are significant, especially in a fire and earthquake-prone area and include:
    - Oil tanks
    - Natural gas line
    - Sulfur filters
    - Siloxane disposal/ground flare
    - Landfill gas pipes at Scholl taking gas to the engines
    - Earthquake or wildfire combined with materials there for operation

- **Hydrology and Water Quality:** *The landfill is unlined; therefore, the proposed project must ensure that oil and other contaminants are contained to protect the groundwater. In addition, more groundwater monitoring needs to be done to assure no release and migration of hazardous materials.*

L119-28

- **Land Use & Planning:** *The landfill and its closed sections operate under a Variance to the Special Recreation zoning use that applies to the entire area. Residential zones encircle the facility. These zoning designations reflect the long-held intent that the entire area would revert to recreational uses once the landfill is closed. It will likely reach its fill limit within 10 years. The Project requires a Conditional Use Permit which would open the door to further industrialization. Residents in the surrounding areas strongly oppose this change.*

L119-29

  - There are residents to the northwest, south, west and east of the proposed site, not just west as stated in section 4.9.1.1.
  - The write-up implies that this 2.2-acre site is immaterial with respect to the giant landfill. However, the proposed project will sit on one of the very few plots of undisturbed land on the landfill. In addition to the graded portion of 2.2 acres, there is an additional 6 acres being cleared for a buffer (table 1, section 2).

- The report states that a conditional use permit (CUP) is needed prior to development. The area is zoned for special recreation and residential 1, neither of which is compatible with an industrialized waste management operation. All of the neighborhoods surrounding the landfill are residential or recreational. The landfill is the aberration. The original intent was to have the landfill revert to recreational uses after it filled.
- According to Glendale Municipal Code, **a CUP can be granted only if**:
  - The proposed use is consistent with elements in the Glendale General Plan. A power plant is not because the General Plan says that the remaining acres will be available for recreation.
  - The proposed use and associated structures and facilities are NOT detrimental to public health or safety or the environment. This project is detrimental in areas discussed in this comment letter (air quality, noise, hazards, wildfire and more). The General Plan also says critical facilities should not be constructed in seismic zones (such as the ones on Scholl Landfill).
  - The proposed use and facility may not adversely affect or conflict with adjacent uses, which this project clearly does.
- A major concern for residents living near Scholl is that if the city is allowed to build this power plant on land which is zoned for recreation, it will be another step in the industrialization of a residential and recreation area. This project will then be used to justify the next encroachment, such as expansion, waste recycling and conversion.
- The gas line which the report says is needed is yet another encroachment and could lead to the expansion of the proposed project in the future.

L119-29

- **Noise:** *The chosen engines put out sound in very low frequencies 24/7. The analysis chart only goes down to 31.5 Hz, while humans can hear down to 20 Hz (and can feel below that). Coupled with the difficulty the terrain makes for analysis, this could be harmful to both humans and animals. The data used in this section was collected for only 6 houses, twice a day for a single day 5 years ago. This is inadequate.*

L119-30

- **Transportation:** *This section underestimates the Project's impact on transportation by not including increased traffic during construction on Glenoaks Blvd and by not addressing at all Colorado Blvd, especially near Figueroa.*

L119-31

- **Utilities and Service Systems:** *This section needs a full discussion of the natural gas line and why it is not underground.*
  - What procedures are in place if storm water or wastewater does not meet either the sanitation district discharge limits or the NPDES discharge limits?
  - Why is a discussion of the 3,500 ft natural gas line not included in Section 4.13 of the EIR? Will the 3,500 ft natural gas line be double walled? How will the natural gas line be secured above ground? Why will the natural gas line not be underground to be compliant with the Glendale General Plan Policy PS/F 6.6?

L119-32

- **Wildfire:** *Wildfire is a huge risk to Glenoaks and Chevy Chase Canyons, Linda Vista and Eagle Rock due to the power plant's location in a designated very high fire zone. These neighborhoods are all limited by narrow, single access roads. The wildfire plan says it minimizes the danger and assumes an on-site water tank and a fire department more than 5 miles away is adequate.*
  - What mitigations are in place now that the flares are being used 24/7? If no additional mitigations are in place, why not?
  - Water Tanks – The two 30,000-gal capacity (4.14.1), tanks would be susceptible to rupture in an earthquake. For this reason, a drainage chart is needed to assure no homes would be impacted in Glenoaks Canyon or other neighborhoods.

L119-33

- Topography (4.14.1.1) The steep and uneven terrain makes fire suppression from the ground unrealistic.
- Wind (4.14.1.1.) Winds in excess of 40 mph are common, gusts exceeding 100 mph are possible. Such wind velocity must be considered in view of fire spread and suppression and the downhill spread of airborne hazardous materials.

L119-33

- Fire (4.14.1.1.) The canyon has a history of brush fires.
  - In the 1980's, a wildfire burnt the entire length of the ridge above the #134 Freeway between Pasadena and Glendale (S side of Glenoaks Canyon).
  - Last year (2019), a fire during August threatened to cut off Glenoaks Blvd. at the mouth of the canyon (the ONLY exit for anyone in Glenoaks Canyon's 750 homes, recreational facilities and two parks). There exists NO OTHER WAY OUT due to the destruction of a former fire road from the north edge of the landfill into Chevy Chase canyon.
  - A few weeks ago (Saturday, August 29th, 2020) there was a fire at the landfill, cause was listed as "spontaneous combustion." It was supposedly reported by a bicyclist.
  - This past Saturday (September 26th, 2020) there was another fire apparently at lower Scholl Park, details are not yet available.
- The City does not enforce weed abatement regulations in the canyon generally and along public roads, in particular Mt. Carmel, Glenoaks Blvd., and Scholl Canyon Rd. (p.4.291)
- The proposed project would add to fire evacuation problems, since the proposed exit down Scholl Canyon Rd. feeds into already overburdened Glenoaks Boulevard (p. 4.14.3.2) This one-lane road would already have to handle outgoing emergency traffic from 750 single-family homes (approximately 1700 residents, estimated that there are 1070 cars), two public parks (Lower Scholl Park with 43 marked parking spaces and Glenoaks Park with about 45 parking spaces around its 1-block perimeter), a major recreational facility with 8 tennis courts, a 18-hole golf course and driving range (102 marked parking spaces) and a baseball field (62 marked parking spaces and additional parking on the street). Now it would also have to funnel the personnel and vehicles from the proposed project into the canyon! Glenoaks has cars parked on both sides of the street, which would make access to fire-fighting equipment almost impossible, especially while panicked residents are trying to flee for their lives. There is, in fact, NO defensible space (p. 4.206) anywhere in our canyon. Evacuation along Glenoaks Blvd. is presently the only exit. In addition, if parents are picking up their kids from Glenoaks Elementary school, there will be a huge traffic jam.
- Aerial attack is the only suppression method possible on the land fill since the Glendale Fire Dept. has ceased to grade and maintain the unpaved fire roads around the canyon. A recent car fire on the grounds of the landfill illustrated the vulnerability of the area surrounding the canyon to fire of all kinds. What access roads are suitable to accommodate emergency response vehicles on or near the site? To what extent will such roads be cleared of surrounding brush on a regular basis (p. 4.214) if it is not being done now?
- According to the EIR, the City of Glendale would be responsible for fire suppression on the proposed site, even though the nearest fire stations are in LA (have any arrangements been made with LA?). It is mapped as a "high fire severity hazard area "(the highest rating available). See p.4.14.2.2. "Stringent fuel modification ordinances" are and have not been enforced. (p.4.14.2.2.) Construction of a (paved?) "small access road" through the site is hardly sufficient for evacuation purposes. On p. 4.292 in the 3rd paragraph, the EIR

summarizes the resulting hazards, i.e. exacerbation of fire hazards, evacuation shortcomings, flooding dangers, etc. but cavalierly dismisses them.

- No mention is made of the danger of the effects of an earthquake on the fault line under the canyon or its enhanced effects on fire danger or hazardous material dispersion. The consequence of an earthquake damaging the internal combustion engine (ICE) protection enclosures cannot be discounted! Also, existing power lines running across the land fill pose an additional danger for possible ignition of brush in high winds or in case of earthquake or fire. (Senate Bill 1028 p. 4.2.88)
- The upper face of the landfill facing the canyon remains unlandscaped and is susceptible to both fire and land- and mudslides (p.299).
- There exists the risk of explosion of the natural gas line (p. 4.296 and p. 4.212) in an earthquake.

L119-33

- Various hazardous materials stored on site could leak into the landfill as a result of an earthquake and/or fire. This landfill has no liner as required in present-day landfills (p. 4.296) and must be treated accordingly with great caution.
- Refueling of vehicles must take place off-site to protect the landfill from spills and leakage. Gas and oil storage areas present a hazard in case of fire and should not be permitted (p. 4.210). A proposed 2,000-gal lube oil storage tank as well as a 3,000-gal capacity waste oil tank have no place on a site subject to wildfire and/or earthquake.
- It must be determined if the 19% aqueous ammonia proposed to be stored on site in an up to 12,000-gal reservoir is flammable. Could this compound be released in an earthquake? Could the compound be carried by prevailing wind and gravity to the residences on the floor of the canyon (750 homes) or other neighborhoods? (p. 4.213)
- Who defines what an "abundance of fire protection capabilities" (p. 4.215) constitutes?

- **Alternatives:** *GWP picked the proposed project without a detailed study of the alternatives and then backed into making them less attractive than the proposed project. An impartial and quantitative discussion of the alternatives is needed, particularly Alternative 2, which cleans up the gas to renewable natural (RNG) gas standards and injects it into the gas company's pipeline. We have talked to vendors who consider Alternative 2 an environmentally-friendly and doable option, although it may require upgrading the landfill gas collection system. Distributing the gas cleaning processes between Scholl and Grayson should also be explored. There is a paucity of quantitative information on the Alternatives. All Alternatives are just rated better, same or worse, when the effects may be small or only during construction. In addition, there may be additional attractive alternatives that should be considered:*

L119-34

  - What is the air quality data for each of the alternatives? How much better are the new flares? What pollutants at what concentrations or amounts are produced by the various Alternatives?
  - Why have the new flares not been installed pending approval of the EIR? Even if the EIR is approved the project will take at least 18 months to be completed. If the new flares are better technology and reduce potential air pollutants they should be installed now. And, Scholl will have to install at least some new flares even if the project goes ahead because the engines cannot utilize all the gas produced by the landfill.
  - Quantify the GHG numbers for each alternative. Table 55 says they are worse for the new flares than the project, which is inconsistent with the tables in section 4.6.
  - Quantify the noise numbers for each alternative.
  - There is no discussion of the equipment needed to purify the gas for either Alternative 2 or Alternative 3 (we assume the equipment for these Alternatives is nearly identical).

- What gases does the equipment take out? How big is the equipment? Are there any pollutants that will be produced in the process or chemicals needed to do this?
- Experts have suggested that the amount of air currently entrained into the landfill gas has significant negative consequences:
    - In particular less methane is produced with this much oxygen (aerobic vs anaerobic decomposition).
    - Significant oxygen can lead to fires underground.
    - The added nitrogen and oxygen are expensive to separate for options such as Alternatives 2 and 3.
- We assume that these alternatives may require some adjustments of the gas collection system to reduce the air content (which, perhaps, should be done for the baseline project and any alternative except full time flaring). These adjustments are called "tuning" by experts in the field. We have talked to two companies that understand this and would like to investigate this more fully (and a third company which was referred to us, but did not want to talk at the present time due to conflict of interest with something to do with GWP). If the gas collection system is tuned, the costs for Alternatives 2 and 3 will decrease.

L119-34

- To examine the "tuning" required, it is interesting to examine the % methane and % air in the two "headers" on the landfill – the headers are labeled north and south (but don't really correspond to those parts of the landfill), with south including some of the inactive areas. From the attached spreadsheet entitled "Gas Composition as function of time" [all data from Sanitation District], one can see that **the percentage of nitrogen (coming from air entrainment) is 50% more on the south header (column N from the spreadsheet). The ratio of methane to CO2 is approximately the same for the two headers (columns F and L from the spreadsheet).** The % methane is closer to 40% for the north header and 30% for the south header, due only to the increased air on the south side. Therefore, minimizing leaks and adjusting the vacuum (to introduce less air) might appreciably reduce the amount of air on the south side. It is very likely that the north side is not optimized either. Have you analyzed this? Will you get experts who could analyze this?

- Alternative 2 states that the construction phase will be worse for air quality, greenhouse emissions, and noise than the project. Please quantitatively compare this with construction for the proposed Project. The construction phase of Alternative 2 will be 15-18 months, but the operation of Alternative 2 will be 20+ years. Why did the EIR not calculate the combined (construction + operation) anticipated effects of the Alternatives and compare them to the proposed project?
- For Alternative 2, where would this further gas purification occurs? Obviously, there is a potential danger with the pipeline to Grayson if the gas is essentially pure methane at elevated pressure in this pipeline. So, it seems reasonable to have the equipment to separate out nitrogen, CO2 and oxygen from the methane at Grayson. Was this considered? If gas purification (or at least some of it) is at Grayson, then less land is needed at Scholl.
- It is important to have quantitative information on the energy loss for Alternatives 2, 3 and 4. Obviously Alternative 1 gives no productive energy.
- Some of the ratings in Table 55 seem strange. Effects during construction should not necessarily cause the rating to be worse. In particular:
    - Alternative 2 is rated worse in geology and soils, perhaps due to construction near Grayson. But this is not a lasting effect, while the impacts at Scholl are lasting.
    - It appears that anything that uses the pipeline to Grayson was rated worse in hazards. But there are significant hazards for the Project at Scholl, such as 2,000-gallon lube oil storage tank, 3,000-gallon waste oil storage tank, 12,000-gallon aqueous ammonia tank, natural gas

line and the power plant site being far from fire crews, etc. Not sure how you decide which is more hazardous.
    - Alternative 2 is rated worse in Transportation and Traffic, just due to construction. Alternative 3 is not rated worse in Transportation and Traffic even though 100's of trucks per day are refueling for 20 years, even after the landfill is closed.
    - Why are Geology and Soils and Hydrology and Water similar between Alternative 4 and the Project? Seems like they should be less for Alternative 4 because there will not be any major construction at Scholl.
    - Wildfire risk for Alternative 1 is rated similar to the Project. But there will be no natural gas line to Scholl in Alternative 1 nor will there be the engines at the landfill nor will there be storage of oil tanks. And likely substantially less construction. Why was it rated the same as the project?
  - Alternative 2 can allow one to specify the end use of the renewable natural gas (RNG). Currently there are big credits for vehicle fuel. So, GWP/Glendale could make a profit generating the RNG and then use the money to purchase solar or other real renewable power. Will this be considered in the cost analysis?
  - If one generates RNG and has it at Grayson, then there are additional options for the gas:
    - Utilize it at Grayson in an emergency
    - Utilize it if for fuel cells as that technology develops to generate hydrogen.

L119-34

- **Summary:**

We think that much more needs to be done to allow the public to fully understand the Project, particularly since it will be there for 20+ years and the landfill will close in the meantime. What will this area look like when the landfill closes? Those of us who live near Scholl do not want more industrialization at the landfill which will be there longer than the landfill is open. We are particularly concerned about the air quality, biological impacts, noise, water contamination and fire danger of this project in an earthquake prone area.

L119-35

We are concerned that the existing flares will be used at all times for some of the gas for the proposed project (as well as back-up if an engine fails or is undergoing maintenance) and as back up for all alternatives except Alternative 1. Since it will take a long time to install the equipment for any alternative, we urge the City of Glendale to look into the new flares immediately to improve air quality. Also, if the proposed project requires fire mitigations, are they needed now for the flares?

We think that Alternative 2, with the removal of nitrogen, CO2 and oxygen done at Grayson (or split between Scholl and Grayson), is attractive and potentially superior to the proposed project in nearly all categories, but importantly in aesthetics, air quality, biological impacts, water contamination and wildfire. Greenhouse gas emissions may be lower too. We understand that somewhat less energy will be available for use and some costs may be higher. But costs to build at Scholl will also be high and the engines are not inexpensive either. In addition, Grayson is likely to already have needed staff. Glendale could likely sell the RNG for a profit (specifying it for vehicle fuel) and use that to purchase more solar for the renewable credits. We have heard GWP representatives say the landfill gas from Scholl is too low of a quality for this option. However, GWP should bring in experts in landfill gas collection system tuning to study this option. We would be happy to provide names of companies which have expressed interest or whose names we were given by others.

At least two of the Alternatives involve the use of Grayson facilities. Both the landfill gas project and the repowering of Grayson impact space at Grayson, Glendale's electricity needs and Glendale's renewable

L119-35 portfolio. Therefore, we believe a joint EIR should have been done to see physically how the projects can fit together, how Glendale's power needs can be met, overall costs and how to meet Glendale's renewable portfolio targets.

L119-36 **Collection of report errors (more major ones, numerous typos are also there):**

- There is a strange statement: "GWP's annual retail electrical load obligation is approximately 1.4 MWhr." This statement can't be correct. (Energy Section, page 4.164)
- Natural gas line – note that the number is correct (if pipe is 3"), but the correct formula is r=0.69*d*sqrt(p) – not what is in the report (Hazards Section, 4.212)
- Contradiction on greenhouse gas section 4.6 and appendix F (see note above under Greenhouse Gas)
- Recent flow rate of landfill gas is 6000 scfm (rather than the 5000 used in the DEIR). The engines cannot handle this much gas so some will have to be flared at all times.
- Flaring data for 2018 used instead of data for 2019 in Section 4.2.

Data below is from https://xappprod.aqmd.gov/find, click on “Select Search Type”, “Facility ID”, enter “045262” and “Search”. This will open SCAQMD’s data for Scholl Canyon. Then select Emissions and the year.

	Sanitation District 2019		DEIR Section 4.2		
	tons/yr	pounds/day	Table 12		significance levels in DEIR
CO	10.885	59.64	42		550
NOx	27.673	151.63	90		55
PM	10.812	59.24	62	for PM 10, PM 2.5	150/55
SOx	11.562	63.35	46		150
VOC	1.679	9.20	7		55

	2018	
	tons/yr	pounds/day
CO	8.318	45.58
NOx	19.739	108.16
PM	11.382	62.37
SOx	8.377	45.90
VOC	1.519	8.32

	2017	
	tons/yr	pounds/day
CO	2.397	13.13
NOx	7.612	41.71
PM	4.052	22.20
SOx	2.835	15.53
VOC	0.499	2.73

	2016	
	tons/yr	pounds/day
CO	0.534	2.93
NOx	2.682	14.70
PM	0.138	0.76
SOx	0.025	0.14
VOC	0.178	0.98

	north					south (older portion & inactive)					
date	O2	N2	Methane	CO2	ratio meth/CO2	O2	N2	Methane	CO2	ratio meth/CO2	ratio Nso/Nno
2/29/2016	5.6	28.9	34.1	28.5	1.20	7.7	39.9	25.8	23.4	1.10	1.38
6/6/2016	4.8	22.7	38.8	31.4	1.24	7.6	36.4	28.2	24.7	1.14	1.60
8/22/2016	6.3	27.7	35.1	28.8	1.22	8.2	38.6	26.5	23.6	1.12	1.39
10/27/2016	4.5	22.8	38.5	31.4	1.23	8.1	37.4	26.6	23.6	1.13	1.64
1/18/2017	5.4	23	37.9	32	1.18	6.6	32.5	31.1	27.1	1.15	1.41
5/30/2017	3.6	17.4	42	34.7	1.21	6.2	30.3	32.5	28.2	1.15	1.74
9/18/2017	2.7	16	42.5	36.2	1.17	6.6	31.8	31	27.1	1.14	1.99
11/15/2017	2.5	16.1	43	36.4	1.18	6.7	33	30.9	26.8	1.15	2.05
1/10/2018	3.1	21.7	39.3	33.8	1.16	6.5	32.7	31.4	27.1	1.16	1.51
5/3/2018	3.9	19.7	40.2	33.9	1.19	5.7	31	32.3	28.2	1.15	1.57
8/20/2018	3.9	19.7	39.9	34.4	1.16	5.8	31.5	32.2	28.1	1.15	1.60
11/28/2018	3.3	18.4	41.25	35.35	1.17	6.2	31.6	32.2	27.9	1.15	1.72
3/11/2019	3	19	40.5	35.6	1.14	6.6	31.7	31.8	27.3	1.16	1.67
4/30/2019	4.1	23.6	37.6	32.4	1.16	6.9	32.3	31.5	26.9	1.17	1.37
12/18/2019	4.7	22.6	38.7	32.8	1.18	6.2	31.9	32.4	28	1.16	1.41
1/22/2020	6.3	28	33.9	29.1	1.16	7.1	34	30.4	25.8	1.18	1.21
5/4/2020	4.4	23.6	38.1	31.8	1.20	8.6	37.7	28.1	23.4	1.20	1.60
										Avg	1.58

L120

From: King, Justin
To: Krause, Erik
Subject: Biogas Renewable Generation Project EIR
Date: Tuesday, September 29, 2020 1:56:49 PM
Attachments: Public comments scholl canyon.docx

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Please find my attached comments to the Biogas Renewable Generation Project Environmental Impact Report

Thank you,

Justin King

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Biogas Renewable Generation Project EIR
633 E. Broadway, Room 103
Glendale, CA 91206.

L120-1 I have been a resident of Scholl Canyon for over seven years and my children attend Glenoaks Elementary School. My family and I have grown to love this canyon and are committed to preserving what makes it special. To be clear I believe that the Scholl Canyon Landfill should be closed when it reaches its permitted fill level sometime in the next ten years. I am firmly against any expansion of the landfill and believe that if approved the Biogas Renewable Generation Project will increase the likelihood that the landfill is expanded.

L120-2 I have read the Draft Environmental Impact Report (DEIR) and have many concerns regarding the proposed Biogas Renewable Generation Project at the Scholl Canyon Landfill (SCL). As an environmental professional who has significant experience in drafting documents similar to EIRs and submitting those documents for public review I was very surprised and alarmed by the number of typos and grammatical errors in the document. The document itself seems rushed and somewhat cobbled together. Typically, when presenting alternatives in an EIR or similar document a thorough analysis of each alternative is presented so that the alternatives can be compared to the project in a fair and accurate manner. While significant research was conducted regarding the proposed project the same cannot be said for the alternatives.

L120-3 The project timeline also does not make sense unless Glendale Water and Power (GWP) is planning to expand the landfill. At the current fill rate the landfill is expected to reach capacity in 2030. If the proposed project is approved the earliest it will be in operation is 2023 which would result in only 7 years of operation while the landfill is still growing. The DEIR does not talk about how the proposed project fits in with GWPs closure plan. If the land is going to be converted to open space will there just be an operating power plan on the edge of that open space. I believe the DEIR should also include a detailed discussion of the proposed project in the long term plans for the landfill property (after the landfill closes).

L120-4 Below are some of my general comments and concerns of the project and DEIR

General Comments/Questions

- What source of water will be used for dust suppression? Will it be analyzed prior to use to confirm that there are no contaminants above regulatory levels?

L120-5
- What type of secondary containment will be used for the 2,000-gallon lube oil storage tank and 3,000-gallon waste storage tank? How ill storm water within the secondary containment be disposed of after a storm event?

L120-6
- Waste oil should only be stored in a hazardous waste compound. Section 4.7.4.2 of the DEIR states that waste oil contained in 55-gallon barrels will be located throughout the Site and does not discuss any secondary containment.

L120-7
- Figure 2.3.3 of the DEIR does not show the locations of the 2,000-gallon lube oil storage tank, 3,000-gallon waste storage tank, or hazardous waste compound. Where will these tanks and compound be located within the project area?

L120-8
- Why is a discussion of the 3,500 ft natural gas line not included in Section 4.13 of the DEIR? Would the 3,500 ft natural gas line be double walled? How will the natural gas line be secured above ground? Why will the natural gas line not be underground to be compliant with the Glendale General Plan Policy PS/F 6.6?

L120-9
- What volume of impurities from condensate is estimated to be stored on-site at one time? Where will the impurities be stored? Is there secondary containment associated with the storage tank?

L120-10
- Where will hazardous waste be stored on-site?

L120-11
- The air modeling only uses two stations located within the basin four and six miles from the Site. I don't believe that the two stations being used are representative of the conditions at the landfill. More air monitoring at the landfill is needed in order to determine the potential effects of the Biogas Renewable Generation Project. Will baseline air monitoring in the surrounding communities be conducted prior to construction?

Water Quality Comments/Questions

L120-12
- There are currently an insufficient number of groundwater monitoring wells downgradient of Barrier 1 to effectively monitor contaminants that migrate off-site. Monitoring well MW-17A is historically dry so only monitoring wells MW018A and MW-18B are monitoring the migration of offsite contaminants. There should be a plan to install additional groundwater monitoring wells in Scholl Canyon.

L120-13
- Groundwater in monitoring wells M02B, M06B, and M08B (which are downgradient of Barrier 1) exceed regulatory levels for Per- and Polyfluoroalkly Substances (PFAS). Will the proposed project contribute to PFAS contamination to groundwater? What is currently being done to remediate groundwater that is impacted with PFAS downgradient of Barrier 1?

L120-14
- The landfill is unlined and the geology beneath the landfill is fractured bedrock. Contaminants can leach into fractured bedrock and migrate beneath Barrier 1 and impact downgradient residential areas. Is there a plan to monitor contaminants in fractured bedrock?

L120-15
- Groundwater monitoring wells should be installed on-site around the proposed project Site to monitor potential releases from the construction and operations phases before contaminants can impact fractured bedrock.

Thank you,

Justin King

L121

From: miri hindes
To: Krause, Erik
Subject: NO BIOGAS PROJECT
Date: Tuesday, September 29, 2020 3:08:02 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Eric Krause:

L121-1 We as citizens and homeowners in Eagle Rock OBJECT to efforts by GWP to construct a gas plant in Scholl Canyon.

L121-2 The 3 main reasons are:
-severe fire danger to my community

L121-3 -neglecting alternative ideas

L121-4 -and refusing to close Scholl Dump, a known hazard.

L121-5 Start over instead of proceeding with a responsible plan.
Sincerely,
Miri Hindes

Sent from my iPhone

L122

From: Scott Freudenberg
To: Krause, Erik
Subject: Proposed bio-gas plant opposition
Date: Tuesday, September 29, 2020 8:56:59 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Krause,

L122-1 As a resident of Glenoaks Canyon for more than 10 years our family is opposed to the building of a biogas plant at the Glendale landfill. The fact that it would be producing methane in an area with high fire danger is very concerning to us. In addition the proximity to homes in the area within 1/2 mile which is a potential health hazard.

Respectfully ,
Scott Freudenberg
Jenny Freudenberg

--
Scott Freudenberg

L123

From: Shanah Blevins
To: Krause, Erik
Subject: I object to the gas plant at the Scholl Canyon Dump
Date: Tuesday, September 29, 2020 10:00:03 AM

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Dear Erik,

L123-1 I strenuously object the gas plant at the School Canyon Dump. I am a resident of Eagle Rock and have been raising my child here since 2005. I do not want the potential hazard of this threatening my home and the health of my family.

Regards,

Shanah Blevins
5133 Townsend Ave.
LA, CA 90041

L124

From: Spen W
To: Krause, Erik
Subject: Scholl Canyon Biogas Plant DEIR
Date: Tuesday, September 29, 2020 9:58:23 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Krause,

L124-1 I am writing to you today with concerns regarding the proposed biogas project at the Scholl Canyon landfill. As a resident of Glenoaks Canyon, my house is less than a mile from the landfill and proposed biogas site. I moved to Glendale in 2013 to raise a family in a safe and healthy environment, and my wife and I are now raising three little boys. I have serious concerns that this project poses a threat to the safety and well being of my family.

L124-2 Is it not true that the biogas project would increase air pollution? Wouldn't it expose residents of Glenoaks canyon and surrounding areas to more cancer causing agents? Is it safe and wise to build a highly explosive processing plant in such a high fire risk area? What extra precautions would the city implement to prevent a catastrophic fire? In 2019 there was a significant fire at the mouth of our canyon, and this year, 2020, there have already been two fires at the landfill site itself. And what would happen in the event of a large earthquake? Would residents be more at risk from methane escaping from a damaged plant? The landfill is already a blight on our otherwise bucolic canyon, won't 40 foot engines and a huge water tank further degrade the appeal of the landscape? Would it be noisy? Would it disturb the peace and quiet of the canyon and disrupt the lives of those of us who live nearby?

L124-3 Mostly though, I don’t understand why the biogas project needs to be built now? Why invest so much money on a project that depends on a landfill which is close to the end of it’s useful lifespan? Unless the city is disingenuous about actually closing the landfill. Investing in the biogas project now would seem to only incentivize the expansion of the landfill would it not? It seems that alternatives have been suggested to the city, and I don’t understand the reluctance to spend more time investigating those alternatives.

L124-4 I think I speak for many canyon residents when I say we don’t trust the city to have our safety as it’s chief priority in this matter. We’ve been kept mostly in the dark about operations at the landfill, including flaring, in which we were never notified of this significant change. I don’t think the city has invested enough time into researching better alternative methods for dealing with the landfill gas, and I am opposed to the construction of the proposed biogas project being built at Scholl.

Sincerely,

Spencer Wright
2720 E Glenoaks Blvd

L125

From: Bonnie Voland
To: Krause, Erik
Subject: Scholl Canyon - Flawed Environmental Study
Date: Wednesday, September 30, 2020 10:58:18 AM

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Dear Mr. Krause:

L125-1 I have been living in the Eagle Rock/Glendale area for over 30 years. It's an area I love so it is very important to me that my generation, our children's generation and generations to come have an environmentally safe neighborhood to live in and thrive in.

L125-2 Unfortunately, the flawed EIR about the proposed Scholl Canyon Gas Plant in a burn area is built on false claims, and this area and all of its citizens are put in grave danger because of it. In addition to being susceptible to earthquakes, there is extreme fire danger (and recent extreme fires serve as dire warnings) at the dump site and continued risk to nearby residents' lungs and lives from pollution at the dump, which still admits hundreds of trucks per day through its sole entrance via the City of L.A., at the north end of Figueroa Street in Eagle Rock. Glendale profits from the dump while defying the Zero-Waste goals set in its December 2011 ordinance. It's sad that profits are put before the health and lives of citizens.

L125-3 I urge you to put a stop to this project that leaves me, my neighbors and everyone in the surrounding area under serious threat.

Respectfully,
Bonnie Voland

L126

From: Christina Hulen
To: Krause, Erik
Subject: NO GAS PLANT
Date: Wednesday, September 30, 2020 8:54:19 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

L126-1 As a resident of Eagle Rock I firmly oppose the proposed building of a gas plant in our area. Not only is it a dangerous and stupid idea. It is an idea built on a lie.

--
Chris Hulen

L127

From: Hans Johnson
To: Krause, Erik
Cc: eapd.la@gmail.com
Subject: EAPD letter on Glendale bid to build gas plant in burn area at Scholl [PDF here]
Date: Wednesday, September 30, 2020 2:50:36 PM
Attachments: Comments.DEIR-Scholl.Dump.Gas-9.2020.pdf[
ATT00001.txt

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Hey, Erik —

L127-1 We submit here, on behalf of the 1,100 members of our organization, the timely letter strongly opposing the draft Environmental Impact Report (DEIR) by Glendale regarding the so-called "Biogas Renewable Generation Project."

We have submitted this comment earlier in hard copy but want to be sure this comment reaches you electronically also.

L127-2 We urge Glendale to go back to the drawing board in light of the evidence and substantive concerns cited herein that render this DEIR as fatally flawed.

We caution that the gaps, gross deficiencies, and glaring disregard for workable alternatives in this draft report are so egregious and its deviation from truthful consideration so offensive that acting further upon this basis will raise questions of public integrity for the city if it proceeds without acknowledging and seriously redressing these fundamental defects.

Please let me know if you have any question or would like additional background on our concerns.

Sincerely,
Hans Johnson
President, EAPD
Eagle Rock neighbor of the dump site

***
Hans Johnson
President, Progressive Victory
"Turning Data Into Power"
Follow on Twitter: @HansPJohnson
ph 323-669-9999
The Administration that sought to deny care to lesbian, gay, bisexual, & trans people, even in emergency rooms, refused to say "LGBT" once in 4-day convention:
https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.washingtonblade.com%2F2020%2F09%2F11%2Flgbtq-the-letters-republicans-didnt-utter%2F&data=02%7C01%7Cekrause%40glendaleca.gov%7Cd2445a6f419d416d4ffc08d8658a954a%7Ce5115311f6c3421bbc03a5d8c79bf546%7C0%7C0%7C637370994263670549&sdata=h3tDlg056L2vuZbJlgrNjP5XGC6KDbROmEuVFIP5sjk%3D&reserved=0

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>>
>>

East Area Progressive Democrats

September 24, 2020

Contact:
ph 323-669-9999
eapd.la@gmail.com

www.EAPD.LA
@EAPDLA

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Hans Johnson

Treasurer:
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Membership Committee:
Ceci Dominguez

Transit Committee:
Christine Louise Mills

Veterans Committee:
Rafael Chagoya L127-6

Gun Violence Prevention Committee:
Mia Livas Porter

Erik Krause, Deputy Director, Community Development
City of Glendale, Community Development Department
633 E. Broadway, Rm. 103
Glendale, CA 91206

Dear Erik and Public Servants in Glendale,

Environmental health, non-polluting waste policies, and honesty in government—public integrity—are core values of our organization that members hold dear. We see these priorities challenged and the safety of our communities ignored and endangered by glaring, disqualifying defects in the Draft EIR (DEIR) released by Glendale on July 2.

The DEIR involves the effort by Glendale Water & Power (GWP) to construct a 12-megawatt gas plant atop the decaying trash pile at the Scholl Canyon Dump, abutting and accessed solely via the City of Los Angeles.

This DEIR, we argue, contains three errors so fundamental to its validity as to make it unworkable as basis for honest reckoning on the proposed project.

In addition, the DEIR is premised on a falsehood. Contrary to assertions by Steve Zurn, general manager of Glendale Water and Power, the **gas pipeline** linking Scholl Dump and Grayson Power Plant, which was put offline in 2016, **actually remains functional and suitable for transmission of methane from the dump to the existing power plant**.

Not only do the city's own documents show this to be true, but a staff lawyer in the office of City Attorney Mike Garcia confirmed this fact in a September 8, 2020, meeting with Councilmember Ara Najarian and Glendale residents. The lack of truthfulness by Mr. Zurn, who spent much of 2019 ducking questions from the public and the press (see Pasadena Star News, April 2019) about the status of the pipeline, was underscored by a whistleblower lawsuit filed in



On Sunday, August 25, 2019, a massive wildfire engulfed hillsides adjacent to Scholl Dump where a gas plant would be placed. Helicopters and L.A. firefighters were required to stop the fast-spreading flames. This was the 8th major fire in this known burn area in just the past 11 years.





L127-7 April 2020 by a former manager at Grayson over insistence she falsify pollution data (see Law360 article below). Was the pipeline shut off to justify **"piecemealing"** these two inextricably connected entities, Scholl and Grayson, in order to **artificially treat the Scholl Dump gas plant project separately**?

L127-8 In particular, the DEIR fails in at least three areas:
1) It **denies the severe fire danger** to the dump site and nearby residents by building the proposed gas plant in a known burn area. It overlooks the health and safety dangers and financial burdens on neighboring jurisdictions, including the City of L.A., stemming from this fire danger. Review of media reports shows that, since 2009, at least 8 major fires have broken out in the terrain directly adjacent to the dump site. In the recent Aug. 2019 blaze, assets from surrounding jurisdictions, including City of L.A. fire crews, had to put it out. Why are the obvious fire danger to the site and disaster response obligations on other jurisdictions, besides Glendale, downplayed with only minor mitigation measures or denied altogether in the document?

L127-9 2) It **neglects Alternative 2**, which entails cleaning up the methane captured from the dump site to standards of natural gas suitable for use. Some, if not all, of this cleanup could be conducted at Grayson. This fact casts added doubt on the justifications for a costly new above-ground pipeline and bid to industrialize the dump site. Why does the DEIR give such slapdash treatment to this feasible option?

L127-10 3) It **refuses to commit to closure of Scholl Dump,** which continues to impose unhealthy air pollution on the lungs of nearby residents and leach contaminants into ground water. The 60th anniversary of the dump, which opened in March 1961, approaches. It took more than five years, from March 2014 to Sept. 2019, just for Glendale to heed repeated warnings from surrounding residents and take its dump expansion off the table. Is this bid to build an **unnecessary gas plant a backdoor path to prolonging dumping at the site?**

L127-11 We urge Glendale to start over instead of proceeding on a false pretext and neglecting a logical alternative.

Sincerely—
Hans Johnson
Hans Johnson
President, EAPD
On behalf of the 1,100 members of our Democratic club

CC: Members of Glendale City Planning Commission
CC: L.A. County Board of Supervisors Members, Districts 1 and 5
CC: Members of Glendale City Council
CC: L.A. City Attorney

References:
July 2020: Glendale issues DEIR to build gas plant at Scholl Dump site:
http://glendalebiogasgeneration.com/#draft-eir
April 2020: Utility manager at Glendale's Grayson plant files whistleblower lawsuit on pollution dishonesty:
https://www.law360.com/articles/1263042/utility-manager-fired-for-fighting-dishonest-report-suit-says
Sept. 2019: After 5 years of resistance by residents surrounding dump, Glendale backs down on expansion:
https://www.latimes.com/socal/glendale-news-press/news/story/2019-09-17/scholl-canyon-landfill-expansion-abandoned
April 2019: Glendale residents face stonewalling by city official over flaring of methane and pipeline status:
https://www.pasadenastarnews.com/methane-burn-off-at-scholl-canyon-landfill-angers-pasadena-glendale-and-la-canada-flintridge-residents
Nov. 2018: Residents learn belatedly that Glendale approved flaring of methane at Scholl Dump site:
https://www.boulevardsentinel.com/burning-of-methane-at-scholl-wcanyon-raises-questions-anew/
March 2018: Opponents of gas plant at Scholl Dump prevail in vote by Glendale panel to review project:
https://www.latimes.com/socal/glendale-news-press/news/tn-gnp-me-scholl-mnd-20180323-story.html
March 2016: Glendale, Pasadena, and L.A. residents unite to fight dump on 55th anniversary of its opening:
https://www.scpr.org/news/2016/03/22/58821/some-la-county-leaders-don-t-like-the-smell-of-a-p/
Jan. 2016, Dump neighbors sound warning in press about pollution dangers from site:
https://www.latimes.com/socal/glendale-news-press/tn-gnp-me-opedstarr-20160123-story.html
Aug. 2014, Residents protest Glendale plan to expand Scholl Dump:
https://www.nbclosangeles.com/news/local/eagle-rock-residents-speak-out-against-landfill-expansion/64948/

L128

From: Edmund H Lew
To: Krause, Erik
Subject: Biogas Power Plant at Scholl Canyon Landfill
Date: Wednesday, September 30, 2020 5:02:17 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Krause,

L128-1 Please accept this as my opposition to the BIogas Power Plant Scholl Canyon Landfill project. The air pollution and other contaminants will be of a significant detriment to the air quality if the proposed Biogas Power Plant were to go forward. This adverse pollution would directly influence Adventist Health Glendale as the hospital is within a 2-mile radius of this project.

L128-2 As a long-standing family physician serving the Glendale community and committee member of the Community Well-being Committee of the Adventist Health Foundation, I implore you to consider the much more environmentally friendly alternative of converting landfill gas to renewable natural gas which will not adversely affect air quality.

Sincerely,

Edmund H. Lew, MD, FAAFP

L129

From: Eileen Hatrick
To: Krause, Erik
Subject: Scholl canyon biogas plant
Date: Wednesday, September 30, 2020 11:46:39 PM

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L129-1 I am a resident of Eagle Rock and also a retired school principal. The school I spent 13 years at as the principal is Dahlia Heights, one of the many schools very close to the Scholl Canyon Dump. I am very concerned that there is a biogas plant being considered on the dumpsite and wanted to express my concern and hopes.

L129-2 The air quality in that area surrounding the dump is not being measured properly and there is a freeway that adds to the poor air quality in the general area. As we all know there is a functional pipeline from Scholl leading to the

L129-3 Grayson Power Plant that could be used to send the methane from Scholl dump to Grayson to be cleared and reused.

L129-4 Because of the many schools, residence, and recreational facilities so close to the sight I believe a biogas plant is unrealistic and very hazardous. My hope is that you consider using the pipeline and upgrade Grayson so it can receive the methane without having a diverse effect on the community in close proximity.

Eileen Hatrick
5466 Dahlia Dr.
LA 90041
3233734883

Sent from my iPhone

L130

From: G Moreno
To: Krause, Erik
Subject: Proposed Biogas Renewable Generation Project
Date: Wednesday, September 30, 2020 5:35:28 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Erik Krause,

The proposed project fails adequately address the air and water quality in the area for local residents.

L130-1 Local air is trapped in Scholl Canyon potentially concentrating contaminates achieving nonattainment measures. Residents can attest to this during the recent Bobcat fire or even on regular trash days. The closest monitoring station to the proposed Project site is located in Pasadena, approximately four miles southeast in Los Angeles County. Data for pollutants that are not monitored at this station, such as SO2, PM10, and lead, are taken from the Los Angeles-North Main Street monitoring station. The second site, the Los Angeles-North Main Street monitoring station, is located approximately six miles south of the proposed Project site. Since the area has been in nonattainment multiple times (see below), there needs to be a local assessment in the canyon to address potential nonattainment concerns.

Nonattainment Area?	Pollutant(s)	Applicable Nonattainment Standard(s)
Yes	Ozone	8-Hour Ozone (1997), 8-Hour Ozone (2008), 8-Hour Ozone (2015)
Yes	Lead	Lead (2008)
Yes	Particulate Matter	PM-10 (1987), PM-2.5 (1997), PM-2.5 (2006), PM-2.5 (2012)
Yes	Carbon Monoxide	Carbon Monoxide (1971)
Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.)	Impaired - 303(d) Listed - With Restoration Plan	

L130-2 The report also fails to address the water resources near the proposed site. The area has Los Angeles River Reach 3 (Assessment Unit ID: CAR405210001999020209015 7), an impaired 303(d) waterway, the Eagle Rock Reservoir (Registry ID:110065563152) and Hillmont Pump and Eagle Rock Chlorination Station (Registry ID: 110000526128).

L130-3 I'm also concerned that residents that do not have internet connection were not able to view materials and were not able to respond. Furthermore, the online meetings are not in the spirit of the Brown Act and may be a violation. In addition, COVID19 has impacted the elderly and those with preexisting conditions from being able to address any issues and concerns that they may have since and they may have transportation issues and not able review materials at city offices.

Thank you for your time and for including my comments.

Sincerely,
Gustavo Moreno

L131

From: G Moreno
To: Krause, Erik
Subject: Re: Proposed Biogas Renewable Generation Project
Date: Wednesday, September 30, 2020 7:14:17 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Erik Krause,

I meant to write the zip code is incorrect on the EIR (see attached).

Best,
GM

L131-1

From: G Moreno
Sent: Wednesday, September 30, 2020 6:00 PM
To: ekrause@glendaleca.gov <ekrause@glendaleca.gov>
Subject: Proposed Biogas Renewable Generation Project

Dear Mr. Erik Krause,

I think the address for written comments may have the zip code (see below). This is likely to have affected mailed in comments.

Sincerely,
Gustavo Moreno

From: G Moreno
To: Krause, Erik
Subject: Proposed Biogas Renewable Generation Project
Date: Wednesday, September 30, 2020 6:00:40 PM
Attachments: Screen Shot 2020-09-30 at 5.59.46 PM.png

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Dear Mr. Erik Krause,

I think the address for written comments may have the zip code (see below). This is likely to have affected mailed in comments.

Sincerely,
Gustavo Moreno

City of Glendale Water & Power

Your Trusted Community Utility

Proposed Biogas Renewable Generation Project

Draft EIR

HOW TO COMMENT: Please provide written comments to Erik Krause, Deputy Director of Community Development, City of Glendale, Community Development Department, 633 East Broadway, Room 103, Glendale, California 91026-4386; fax

L132

Krause, Erik

From: JW.com <jack@jackwalworth.com> on behalf of Jack Walworth <jackwalworth@gmail.com>
Sent: Wednesday, September 30, 2020 3:26 PM
To: Krause, Erik
Cc: Agajanian, Vrej; Najarian, Ara; Devine, Paula; Brotman, Daniel; Kassakhian, Ardashes
Subject: Scholl Canyon Landfill - Biogas Draft EIR

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Erik Krause,

L132-1 Thank you for the opportunity to address our concerns with the Draft EIR for the Biogas Power Plant at the Scholl Canyon Landfill. We have lived in Glenoaks Canyon for 25 years and want to see the community grow our green space as the landfill closes down at the designated lifespan. That said, I worked with a local group that analyzed the DEIR and found it biased and wanting in details. We need a viable document to determine the most effective and safe way to dispose of the methane gas that emanates from the landfill. Here are our specific concerns:

1. L132-2 **The objective of the proposal** is to find a beneficial use of the methane within the landfill gas to generate electrical energy. We feel that it is disingenuous to propose a project of this scale without looking at the overall plan for the city including Grayson. We should not be proposing any kind of gas-burning generation within the city.

2. L132-3 **Geographic Location of the Proposed Plant.** Establishing a new industrial site at the top of this mountain that is designated for recreational use once the landfill is closed is not a forward-thinking plan. The area is high risk for wildfire, earthquakes, and does not fit with the green space future plans. This summer's enormous wildfires throughout the state and even an earthquake that woke us up recently should be an ominous warning.

3. L132-4 **Zoning.** We do not support a change in the zoning for the industrial development of the area. Please provide the details of the next steps for the Planning Commision to vote on any zoning change.

4. L132-5 **Air Pollution.** As we understand the DEIR, there is no specific discussion of using the best available technology to eliminate pollutants from the landfill gas. Rather, it seems the GWP assumes that we will get Priority Reserve Credits to make it green on paper and we still have to breathe the bad air. We feel that burning the air locally is not a healthy option and the economics of cleaning the landfill gas for use at other sites outside the city or transforming it for use in NG vehicles are much better solutions.

5. L132-6 **More details are needed to come up with better solutions.** The changes need to happen now. The flaring is a stop gap solution. An overall holistic solution to Glendale's energy plan is the most important next step. We need to allocate resources according to a future plan for solar, storage and other forms of clean energy. This DEIR is short-sighted. It seems to have a predetermined answer rather than opening the question to discuss all the alternatives.

L132-7 Please consider going back to the drawing board and looking at alternatives that fit into an overall plan for a sustainable, greener Glendale future before the entire state goes up in flames!

With respect,

Jack Walworth and Dorothy Low
+1-213-804-2246
jackwalworth@gmail.com

L133

From: Jen McCall Wright
To: Krause, Erik
Cc: spenedit@gmail.com
Subject: Scholl Canyon Biogas Plant DEIR
Date: Wednesday, September 30, 2020 3:36:11 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Mr. Krause,

L133-1 My husband and our 3 sons live in Glenoaks Canyon on Glenoaks Boulevard about 1 mile from the Scholl Canyon landfill. We have serious concerns that the proposed biogas project poses a threat to the safety and well-being of our family. We oppose the industrialization of the landfill and favor the closure and cleanup of the landfill in the near future.

I would like to reiterate the very serious concerns brought forth by CSLA (COALITION for SCHOLL LANDFILL ALTERNATIVES) about the DEIR that has been prepared in connection with the proposed power plant at Scholl:

L133-2 "We ask that these concerns be carefully considered, because they are motivated by our deep commitment to ensuring the safety of our neighborhoods, both now and in the future. The historic wildfires that we have been witnessing make it clear that climate change is here and will exacerbate many of the issues that worry us the most as time passes.

Wildfire: Wildfire is a huge risk to Glenoaks and Chevy Chase Canyons, as well as to the nearby Linda Vista and Eagle Rock neighborhoods. Any discussion of the future of the landfill, due to its location in a designated very high fire zone, must have fire prevention and safety at the forefront. These neighborhoods have mostly narrow, single-access roads. The wildfire plan minimizes the danger and carelessly assumes that an on-site water tank and a fire department more than five miles away are sufficient.

Air Quality: We are also concerned about the unhealthy and dangerous emissions the plant will produce to pollute the air we breathe. There are cleaner solutions to burning the methane and we ask you to consider them.

Pollution from the project will exceed the South Coast Air Quality Management District (SCQAMD) thresholds for four contaminants, but the DEIR does not discuss either mitigation or using the best available control technology (BACT). Instead, the DEIR assumes that GWP will get priority reserve credits to eliminate the pollutants on paper. Measurements of the pollutants are made from monitors that are not near the landfill.

This is NOT a green project. The priority reserve credits that GWP hopes to receive make it

green on paper, but it is NOT green for our lungs, our bodies, our children, or our neighborhoods.

The DEIR also ignores carcinogenic pollutants such as dioxins and furans.

L133-2 Geology and Soils: The project will be located atop a mountain that sits near a potential 6.7 earthquake fault. Seismic waves on a mountain can be amplified to 4 or 5 times the strength of field waves, and the report both proposes insufficient mitigation measures for threats to power equipment, buildings, tanks, and pipelines and fails to present emergency back-up systems to mitigate damage from earthquakes or fire.

We all got a wake-up call just before midnight on Friday, September 18. The earthquake was a relatively mild one, but it still shook vigorously and for a long time. How would the proposed power plant stand up to a quake directly beneath it? The DEIR doesn't even address that possibility.

Also, the Scholl biogas plant should not be analyzed separately from a holistic Glendale energy plan that includes Grayson Power Plant and the methane from Scholl.

Taking all these matters into account, the DEIR for the proposed plant at Scholl Canyon has not taken into consideration any future closure plans for the landfill in relationship to the plant. Promises to close the landfill and return it to recreational use have been made and broken many times in the past. The landfill is now scheduled to close in 2028. Where, and what, is the plan for that?

This highlights the fundamental problem, not only with the proposed power plant, but, more broadly, with the existence of a landfill, so close to our neighborhoods, unlined in parts, and in a high fire zone. A replacement for the landfill needs to be identified, and plans need to be made for its cleanup and closure, NOW, rather than at some vague point in the future."

L133-3 Again, my family is opposed to this project. We hope you take our sincere concerns and those of our fellow neighbors seriously.

Regards,

Jennifer Wright
2720 E. Glenoaks Blvd.
Glendale, CA 91206

L134

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

1 I don't want this so close to home. Processing the highly explosive methane Nearby is downright scary.

2 Air pollution increase is UN-acceptable -

3 Plus the location is only ½ mile from the Verdugo Hills fault —

4 Don't DO THIS Biogas project so close to home, here in Glencoaks Canyon —

Thank you.

Sincerely,

Judy Cook



Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

==========fold==========

==========fold==========

L135

From: koreen cea
To: Krause, Erik
Subject: Eagle Rock Community member & elected AD County Delegate- We say No to Scholl!
Date: Wednesday, September 30, 2020 4:42:30 PM

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Erik Krause
Deputy Director of Community Development
City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, CA 91026-4386
September 30, 2020

Dear Mr. Krause:

L135-1 I hope you will take my concerns seriously enough to share them with your fellow city officials in Glendale. I oppose the draft Environmental Impact Report (DEIR) and urge the city to go back to the drawing board after this deficient first attempt.

L135-2 It is hard to imagine and harmful that you and your colleagues overlook the fact that building a gas plant at a dump located in a fire zone, near a large community of residents and homes, is foolish and dangerous. At least 8 serious blazes have broken out on terrain abutting the dump in the past decade. Fires have also ignited on the dump itself.

L135-3 This proven danger makes placement of a gas plant on the dump nothing but explosive. The health and the safety of nearby residents, like our very lives, are imperiled but are NOT to be treated as expendable.

L135-4 The push for a gas plant at Scholl Canyon is premised on untruthfulness by Glendale officials about the existing pipeline from the dump site to the Grayson power plant. It remains functional, as public records and the city's attorney's office confirmed earlier this month. That contradicts the utterance of Steve Zern, General Manager of Glendale Water and Power and chief promoter of the gas plant at the dump.

L135-5 It also signifies a side-door maneuver to extend dumping at School Canyon by industrializing and sinking more costs, from taxpayer dollars, into the site to justify its longevity. This effort to evade the September 2019 announcement by Glendale,that it was abandoning expansion of the dump, is dishonest and shameful. It puts profits by Glendale from dumping at Scholl, which worsens pollution burdens onto surrounding residents, over the health and safety of neighbors on all sides of the dump.

L135-6 Community resistance to previous efforts to expand the dump has led to their defeat. Yet Glendale doubles down on a terrible proposal to build a gas plant there, a case based on untruths.

L135-7 Please go back and redraft with full and truthful evidence any report about the impacts of a gas plant at the dump site. This current draft report is based on false premises and failures to consider the fallout on neighbors from building a gas plant in a fire zone.

Sincerely,
Koreen A. Cea MA Ed.
30 year veteran educator
Elected Delegate
Assembly District 51
Democratic County Committee
2020-2024

4926 Los Robles St.
Los Angeles, CA 90041
323-356-9100
kacea63@gmail.com

L136

From: LARiverCommunities EnvironmentalEquity
To: Krause, Erik
Subject: We Oppose the Scholl Canyon DEIR
Date: Wednesday, September 30, 2020 2:57:42 PM

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Erik Krause, Deputy Director of Community Development
City of Glendale, Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

fax: (818) 240-0392 or
email: ekrause@glendaleca.gov

Dear Mr. Krause:

L136-1 I am a resident of Los Angeles, and have been following the process with the Scholl Canyon dump, because as I'm sure you know, air quality impacts us all, and this site impacts neighboring communities – air quality does not confine itself to zip codes.

L136-2 I am writing with the trust that you will honor our concerns and share them with your fellow Glendale city officials. The draft Environmental Impact Report (DEIR) is insufficient and I oppose its use; the city needs to provide a more comprehensive and thorough DEIR.

L136-3 The push for a gas plant at Scholl Canyon is based on some selective fact-taking by Glendale officials regarding the existing pipeline from the dump site to Grayson power plant. Public records and the city attorney's office confirmed that the existing lines are functional. This fact contradicts comments from Steve Zurn, General Manager of Glendale Water and Power and chief promoter of the gas plant at the dump.

L136-4 It seems to us that Glendale is trying to find a reason to keep this grossly polluting and outdated project active by dropping in more tax payer dollars. At the end of the day, residents of Los Angeles will bear the pollution from this project. I have been at the rallies, I did my part to help elect environmental leaders to the Glendale City Council and I have seen the crowds at the rallies – the word is out that this plant is a dangerous idea that neglects the health and safety of our communities and the environment.

L136-5 I look forward to reviewing a comprehensive DEIR that is built upon a complete rendering of the facts and the health, safety and climate crisis implications of building a gas plant in a fire zone.

Yours,
Christine Louise Mills
Director, LA River Communities for Environmental Equity
2444 Riverdale Ave., Los Angeles, CA 90031
larivercee@gmail.com

--
Clean air, safe space for all.
LARCEE.ORG
Follow us on Twitter & keep good things happening for public health along the LA River Greenway!

L137

From: Nina Chomsky
To: Krause, Erik
Subject: DEIR Comments: Glendale Proposed Biogas Renewable Generaltion Project
Date: Wednesday, September 30, 2020 4:30:17 PM
Attachments: LVAA DEIR Comments -- 9-29-2020.pdf

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Erik Krause
Deputy Director, Glendale Community Development Department

Mr. Krause:

L137-1 Please file the attached Comment Letter in connection with the above-referenced DEIR. I would appreciate acknowledgment of receipt.

Thank you,

Nina Chomsky,
President, Linda Vista-Annandale Association

(626) 795-1967

LINDA VISTA-ANNANDALE ASSOCIATION
P. O. Box 94364
Pasadena, CA 91109

September 29, 2020

Mr. Erik Krause
Deputy Director, Glendale Community Development Department
Glendale, CA 91206

Via Email: ekrause@glendaleca.gov.

Re: Draft Environmental Impact Report Comments for Glendale's Proposed Biogas Renewable Generation Project

Mr. Krause:

The Linda Vista-Annandale Association (LVAA) appreciates this opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for Glendale's Proposed Biogas Renewable Generation Project (the Project).

L137-2 Incorporated in 1930, LVAA is a California non-profit, mutual benefit corporation, tax exempt under IRC Section 501(c)(4), and corresponding California tax law, dedicated to the improvement and development of the Linda Vista-Annandale neighborhood area of Pasadena, and the promotion of the general welfare of Linda Vista-Annandale residents.

The Linda Vista-Annandale neighborhood area consists of roughly 2.5 square miles, extending from the west bank of the Arroyo Seco to the boundary with Glendale in the area of the Linda Vista portion of the San Rafael Hills, and from the Devil's Gate Dam

Our neighborhood includes, and LVAA represents, approximately 1,330 single-family homes located in the City of Pasadena. Our neighborhood also includes an important school, the Art Center College of Design Hillside campus. To the east and south, our neighborhood, including the Art Center, are immediately adjacent to, and nearly abut, the Scholl Canyon Landfill (SCLF), the location of the proposed Project.

L137-3 1. Significant Effects; Mitigations. Importantly, the LVAA neighborhood area is identified in the DEIR as part of the Project's Environmental Setting. Therefore, a full analysis in the DEIR of all environmental effects, including potentially

significant environmental effects, of the Project on our neighborhood area is required, and failure to fully analyze all such actual and potentially significant impacts renders the DEIR inadequate. The DEIR also is required to include Mitigation measures to reduce significant environmental effects to less than significant, and failure to do so renders the DEIR inadequate.

L137-3 The LVAA neighborhood area is directly impacted by potentially or actual significant environmental effects from all of the identified topics in the DEIR, particularly Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Transportation and Traffic, and Wildfire. The DEIR's failure to include any analysis of these environmental effects on our LVAA neighborhood area, including the larger LVAA neighborhood discussed below, in effect, skipping over the large number of sensitive receptors located in our neighborhood, renders the DEIR inadequate.

2. <u>Air Quality.</u> Air Quality is of particular interest to LVAA, particularly the degree to which the Project will add to the Particulate Matter and Fine Particulate Matter, and Fugitive Dust, impacts on our single family neighborhood area which is adjacent to the Project. Our neighborhood, which is an area of approximately

L137-4 1,330 single family homes, plus the Art Center Hillside Campus, is filled with sensitive receptors. Simply skipping over our many residential homes and the Art Center in describing the Existing Conditions for the Air Quality analysis, and skipping any analysis of the Air Quality analysis, renders the DEIR analysis inadequate, particularly on a cumulative basis.

As we previously stated in our EIR Scoping Letter, Air Qualify impacts, particularly public health impacts, must be studied and mitigated with reference to the LVAA neighborhood area and over an area in Pasadena that is larger than the LVAA neighborhood. This larger area includes the Arroyo, including the Central Arroyo recreational areas utilized by thousands of persons a year, and the Rose Bowl used normally for numerous sports and entertainment recreational purposes, and, the residential neighborhoods and schools on the east side of the arroyo. Sensitive receptors in the LVAA neighborhood, including the Art Center and this larger area will be exposed to substantial pollutant concentrations, particularly on a cumulative basis. Fine Particulate Matter and Fugitive Dust must be adequately analyzed and significant effects adequately mitigated on an ongoing construction and operational bases, such as on-site and mobile Air Quality real time monitoring, and mitigations aimed at reducing significant construction and operational diesel truck trip impacts.

L137-4

As previously called out in our EIR Scoping Letter, the LVAA neighborhood and the larger LVAA area, including particularly, the Central Arroyo and the Rose Bowl, are all significantly impacted by another project to the north: the Los Angeles County's Devils Gate Reservoir Restoration (Sediment Removal and Management) Project, also known as the Hahamongna Sediment Removal project. This enormous project, ongoing for years to come, is dismissed by the DEIR as "too far away", but the Sediment Removal project impacts most of the Upper Arroyo and Central Arroyo and has had and does have. enormous Air Quality and Public Health impacts on the LVAA neighborhood and the larger LVAA area.

Polluted air from both projects will mix in this larger LVAA area, and, of course, the DEIR must recognize that Air Quality does not recognize geographical or political borders. In connection with a significant Sediment Removal CEQA lawsuit involving, among other issues, Air Quality, that was recently settled, and ongoing major efforts by resident groups in La Canada Flintridge, LA County has instituted major mitigation measures with respect to diesel trucks and sediment removal activities. The DEIR is inadequate in that it fails to recognize and analyze, and adopt Mitigations, addressing Air Quality cumulative impacts from the Sediment Removal project and the proposed Project.

L137-5

3. Aesthetics; LVAA Area Views. The Aesthetics section of the DEIR is inadequate in that it fails to analyze and mitigate views from the upper part of the LVAA area toward the Project. LVAA is informed that some single-family homes in our neighborhood area will see all or some part of the Project. View sheds from the upper LVAA area should be analyzed and mitigated as required by CEQA.

L137-6

Thank you for your attention to our comments and concerns. We also intend to file additional comments on the DEIR in the future.

Sincerely,

/s/ Nina Chomsky

Nina Chomsky,
LVAA President,
nrchomsky@aol.com
president@lvaa.net
(626) 795-1967

L138

From: Liuba Shapiro-Ruiz
To: Krause, Erik
Subject: Objection to Biogas Renewable Generation Project EIR
Date: Wednesday, September 30, 2020 3:34:32 PM

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Erik Krause
Deputy Director of Community Development
City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

L138-1 Dear Mr. Krause,
My name is Liuba Ruiz and I am a resident of North East LA. I am writing you today to get my objection on the record for the Biogas Renewable Generation Project EIR.

L138-2 A 12-megawatt gas plant atop a decaying trash pile at the Scholl Canyon Dump is not what the community needs. This is bad for our health, bad for the environment and potentially incredibly dangerous as it sits in a burn area located far too close to a very populated residential area. Especially given our current climate and fire season we must avoid what could result in a horrible disaster and a burden for our children.
Ultimately, it also should be noted that support to close the dump is far preferred to any other alternative.

L138-3 Thank you for including my concerns on the record - this is a detrimental proposal that could create irreparable damage to the larger Los Angeles community - we should not allow this project to move forward any further.

Kind regards,
Liuba

Liuba Ruiz
liubalosangeles@gmail.com

L139

From: Martins Aiyetiwa
To: Krause, Erik
Cc: Dave Nguyen; Carlos Ruiz; Coby Skye; Julia Weissman
Subject: Scholl Canyon Landfill Biogas Renewable Project - July 1, 2020, DEIR - LA County Public Works" Comments
Date: Wednesday, September 30, 2020 4:52:26 PM
Attachments: image001.png
LA County PW's September 28, 2020, Comments.pdf

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Mr. Krause,

L139-1 Attached for your review and processing is the Los Angeles County Public Works' comments on the July 1, 2020, Draft Environmental Impact Report that was prepared for the City of Glendale's proposed Scholl Canyon Landfill Biogas Renewable Project.

Please let me know if you have any questions.

Martins Aiyetiwa, P.E.
Senior Civil Engineer
Los Angeles County Public Works
Phone: (626) 458-3553
Mobile: (626) 703-8150

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

MARK PESTRELLA, Director

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ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE
REFER TO FILE: EP-5

September 28, 2020

Mr. Erik Krause
City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91206-4386

Mr. Krause:

SCHOLL CANYON LANDFILL
BIOGAS RENEWABLE ENERGY GENERATION PROJECT
COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT

L139-2

The Los Angeles County Public Works appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR), which was released for agency and public review on July 1, 2020, for the City of Glendale's proposed Scholl Canyon Landfill Biogas Renewable Generation Project (Project).

CEQA Background

In 2017, the City prepared an Initial Study/Mitigated Negative Declaration (IS/MND). The City Planning Commission declined to adopt the IS/MND and recommended an Environmental Impact Report (EIR) be prepared in order to evaluate a reasonable range of alternatives to the Project. Subsequently, the City of Glendale prepared an IS for the Project and released for agency and public review on March 21, 2019, which Public Works provided comments on in its letter dated April 18, 2019 (Enclosure). As a result of feedback received during the public review process and to conform to the recently updated California Environmental Quality Act (CEQA) Guidelines, the City decided to prepare this new Draft EIR (DEIR) dated July 1 2020, to fulfill the CEQA requirements for the Project.

Project Background

The proposed Project is located at Scholl Canyon Landfill (Landfill/SCLF), an existing Class III nonhazardous solid waste landfill. The Landfill is owned and operated through a Joint Powers Agreement between the City of Glendale, County of Los Angeles, and County Sanitation Districts. The Landfill site occupies 535 acres with portions owned by the City of Glendale, County of Los Angeles, and Southern California Edison Company. Regional access to the Landfill is from the Ventura Freeway (State Route 134) at the Figueroa Street exit.

L139-3

The Project will be at the Landfill and located on approximately 2.2 acres of land owned by the County. The Project consists of the construction and operation of a 12-megawatt biogas power generation facility, and auxiliary water and natural gas pipelines. The purpose of the Project is to beneficially utilize the renewable landfill gas as fuel to generate electricity on-site instead of transferring it off-site to the Grayson Power Plant.

Previously, the City proposed an expansion to the Scholl Canyon Landfill in addition to the construction of the Biogas Renewable Energy Generation Project. The DEIR, ***Section 3.2, Related Projects and Cumulative Impacts***, states "The Landfill Expansion is no longer proposed, is no longer reasonably foreseeable and, as such, was not carried forward to the cumulative impacts analyses included in Section 4.0 of the DEIR."

Public Works has reviewed the Draft Environmental Impact Report dated July 1, 2020, prepared by Stantec Consulting Services, Inc., for the City of Glendale, and offers the following comments:

Specific Comments

L139-4

- **Section 3.20 – Wildfire**

    - The DEIR indicated that, "the probability of a wildfire to occur as a result of unmitigated Project construction would be low due to the low vegetative fuel load present, expansive unvegetated areas at the adjacent SCLF, the proposed moderate level of heavy equipment use, and the short term duration of construction activity. **Nonetheless, any fire that escapes control or spreads into the surrounding area could result in a large amount of damage, and the risk of fire as a result of unmitigated Project construction is therefore considered potentially significant**."
      As previously noted in Public Works' letter dated April 18, 2019, (see attached), the DEIR must provide a comprehensive analysis on

L139-4

emergency evacuation routes and response plan, or reference an existing plan, for the landfill and surrounding community in case of a fire disaster event.

- **Section 4.4.2.1 – Energy**

L139-5

  - Since this section contains language regarding reducing emissions from medium-to-heavy duty vehicles, we suggest adding California Air Resources Board's (CARB) new Advanced Clean Trucks Rule (Resolution 20-19), adopted June 25, 2020, to this section. The Advanced Clean Trucks Rule requires manufacturers to sell zero-emission medium-and heavy-duty vehicles as an increasing percentage of their annual California sales, large fleet owners, including local jurisdictions, to submit a report on existing fleet operations to CARB, and directs CARB staff to take steps to electricity medium-and heavy-duty vehicles by 2045, with an earlier transition for refuse trucks and government fleets by 2040.

- **Section 4.11 Transportation**

L139-6

  - The requirement in CEQA Guidelines Section 15064.3, to use Vehicle Miles Travelled as the metric for transportation analysis, took effect on July 1, 2020. Since the DEIR for the Scholl Canyon Landfill project was released to the public on July 2, 2020, a Traffic Impact Analysis based on the Vehicle Miles Travelled metric may be required.

- **Section 5.3 – Alternatives**

L139-7

  - The alternatives analysis should consider how SB 1383 and the diversion of organic waste from landfills will affect the amount of Landfill Fill Gas (LFG) that will be generated on-site over time. LFG is comprised primarily of methane, which is generated by the decomposition of organic waste under anaerobic conditions. Over time, less methane and LFG will be generated at SCLF due to the diversion of organic waste.

- **Section 6.4 - Effects Found Not to Be Significant**

L139-8

  - The DEIR states that "the LFG gas collection system already exists, and the proposed Project does not include a component that would substantially increase the risk of a release of LFG that could create an odor. Considering the lack of substantial new odor sources associated with the proposed

Project and the potential odors related to the existing landfill operation itself, the proposed Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. No impact would occur."

L139-8 Based on the project description, the purpose of the Project is to beneficially utilize the methane-rich renewable LFG generated by the Landfill as fuel to generate electricity on-site at the source of the LFG instead of transmitting the gas across town in an underground pipeline for combustion at the Grayson Power Plant. If this is the case, the DEIR should provide in-depth analyses on the potential odor emissions, and specifically, odor nuisance, that could occur during construction when the existing landfill gas pipeline to the Grayson Power Plant is capped and the gases are diverted to the existing flare system, or odors that could occur during operation and maintenance, as well as potential fugitive VOC and methane emissions.

L139-9 If you have any questions regarding this matter, please contact me your staff may contact Mr. Martins Aiyetiwa at (626) 458-3533 or maiyetiwa@pw.lacounty.gov.

Very truly yours,

MARK PESTRALLA
Director of Public Works

COBY J. SKYE
Assistant Deputy Director
Environmental Programs Division

MA:sg
P:\SEC\SG\EP5\SCHOLLBIOGASDEIRCOMMENT.DOCX

Enc.

cc: Chief Administrative Office (Amir Alam)
County Counsel (Julia Weissman)
Sanitation Districts of Los Angeles County (Charles Boehmke)

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

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MARK PESTRELLA, Director

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ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE
REFER TO FILE: EP-5

April 18, 2019

Mr. Erik Krause
City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91206-4386

Mr. Krause:

SCHOLL CANYON LANDFILL
BIOGAS RENEWABLE GENERATION PROJECT
COMMENTS ON INITIAL STUDY

Los Angeles County Public Works (Public Works) appreciates the opportunity to comment on the Initial Study (IS), which was released for agency and public review on March 21, 2019, for the City of Glendale's proposed Scholl Canyon Landfill Biogas Renewable Generation Project (Project).

CEQA Background

In 2017, the City prepared an Initial Study/Mitigated Negative Declaration (IS/MND). The City Planning Commission did not adopt the IS/MND and recommended an Environmental Impact Report (EIR) be prepared in order to evaluate a reasonable range of alternatives to the Project. As a result of feedback received during the public review process and to conform to the recently updated California Environmental Quality Act Guidelines, the City decided to prepare this new, March 21, 2019, IS specific to the EIR process for the Project.

Project Background

The proposed Project is located at Scholl Canyon Landfill (Landfill), an existing Class III nonhazardous solid waste landfill. The Landfill is owned and operated through a Joint Powers Agreement between the City of Glendale, County of Los Angeles, and County Sanitation Districts. The Landfill site occupies 535 acres with portions owned by the City of Glendale, County of Los Angeles, and Southern California Edison Company. Regional access to the Landfill is from the Ventura Freeway (State Route 134) at the Figueroa Street exit.

The Project will be at the Landfill and is located on approximately 2.2 acres of land owned by the County. The Project consists of the construction and operation of a 12-megawatt power generation facility, and auxiliary water and natural gas pipelines. The purpose of the Project is to beneficially utilize the renewable landfill gas as fuel to generate electricity on site instead of transferring it off site to the Grayson Power Plant.

Public Works has reviewed the IS dated March 21, 2019, prepared by Stantec Consulting Services, Inc., for the City of Glendale, and offers the following comments:

Specific Comments

- **Section 2.5.2 - Phase II – Site Grading and Construction**
    - The IS indicated that approximately 20,000 CY of soil would be excavated during the grading process, of which 6,000 CY of soil would be used on site as fill and 14,000 CY of clean soil would be used as cover at the Landfill. The EIR should provide in-depth analyses on the potential impact due to dust pollution resulting from the grading construction process as well as stockpiling of excavated soil for future use at the site.
- **Section 3.3.2 - Air Quality Impact Analysis**
    - The IS indicated that the "Landfill Gas (LFG) gas collection system already exists, and the Project does not include a component that would substantially increase the risk of a release of LFG that could create an odor. Considering the lack of substantial new odor sources associated with the Project and the potential odors related to the existing landfill operation itself, the Project would not result in other emissions (such as those leading to

odors) adversely affecting a substantial number of people. No impact would occur, and this factor will not be further analyzed in the EIR."

Based on the project description, the purpose of the Project is to beneficially utilize the methane-rich renewable LFG generated by the Landfill as fuel to generate electricity on site at the source of the LFG instead of transmitting the gas across town in an underground pipeline for combustion at the Grayson Power Plant. If this is the case, the EIR should provide in-depth analyses on the potential odor emissions, more specifically, odor nuisance, that could occur during construction when the existing landfill gas pipeline to the Grayson Power Plant is capped and the gases are diverted to the existing flare system, or odors that could occur during operation and maintenance as well as potential fugitive VOC and methane emissions.

Additionally, the environmental document does not address potential hazards arising from the subsurface migration of landfill gases such as methane, carbon dioxide, and other gases for project-related structures. This needs to be addressed in the EIR for further comments.

- **Section 3.7.1 Geology and Soils**
    - All geotechnical issues discussed in the Notice of Preparation/IS should be addressed in the EIR. Geotechnical reports addressing the proposed development and recommending mitigation measures for the geotechnical hazards should be included as part of the EIR.
- **Section 3.10 Hydrology and Water Quality**
    - All Hydrology and Water Quality issues discussed in the Notice of Operation/IS should be addressed in the EIR.
- **Section 3.13.2 – Noise Impact Analysis**
    - The IS indicated the Project will result in potentially significant impacts on ambient noise levels, groundborne vibrations, and/or groundborne noise levels near the vicinity of the Project and this impact will be analyzed in the EIR. Recognizing that due to the close proximity of the Project to the surrounding community, noise will be the source of significant concern for the surrounding community. Therefore, the EIR should provide an in-depth

analysis on this factor. It should also discuss and provide rationale for the selection of the representative sensitive receptors, their locations, and the respective noise impact thresholds for each of the receptors.

- **Section 3.17.2 Transportation and Traffic Impact Analysis**

  - There are three currently proposed projects at the Landfill: the Scholl Canyon Landfill Expansion Project, the BioGas Renewable Energy Facility Project, and the Anaerobic Digestion Facility Project. These Projects would utilize the same hauling routes, access roads, and feeder roads and will potentially be operating at the same time. The IS does not discuss or analyze the combined impact of these Projects on the traffic patterns at the entrance and the adjacent surrounding communities. There should be detailed analyses on the combined impact of these Projects on the traffic patterns in the EIR.

    Additionally, the IS indicated that project construction could potentially significantly increase vehicular traffic that could affect the performance of the surrounding street system as the result of construction worker traffic and construction vehicles, and this impact will be further analyzed in the EIR.

    Besides traffic impact during the construction phase, the project is expected to have a significant traffic impact to City intersections in the area due to the cumulative projects (e.g. the Bio-Gas Renewable Energy Facility Project, Grayson Power Plant Project, and the Anaerobic Digestion Facility Project). Consequently, the Project is required to submit a Traffic Impact Analysis (TIA) to the City of Glendale for review and approval. At this time, Public Works has no comments on this section of the IS. However, since the Project is located on a County-owned parcel, County requested that the City forward a copy of the TIA to County for review.

- **Section 3.20 – Wildfire**

  - The IS indicated that the City of Glendale Emergency Plan does not identify evacuation routes and the IS acknowledged that the "Project and the surrounding area are within the current City's designated High Fire Hazard Area. Project activities would include the use of flammable/combustible materials and potential sources of ignition including but not limited to equipment engines, welding, and LFG flares. Construction, maintenance,

and operation of the Project may due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, the Project may have a potentially significant impact." Therefore, the City should consider providing an in-depth analysis in the EIR on emergency evacuation routes and response plan for the Landfill and surrounding community in case of a fire disaster event.

If you have any questions regarding this matter, please contact Mr. Carlos Ruiz at (626) 458-3501 or CARUIZ@dpw.lacounty.gov.

Very truly yours,

MARK PESTRELLA
Director of Public Works



COBY J. SKYE
Assistant Deputy Director
Environmental Programs Division

DN:td
P:\eppub\Secfinal\EP-5 Solid Waste Engineering\2019 Folder\Scholl Cyn IS.docx

cc: Chief Executive Office (Chia-Ann Yen)
County Counsel (Julia Weissman)
Sanitation Districts of Los Angeles County (Grace Robinson Hyde)

L140

From: matthew bissonnette
To: Krause, Erik
Subject: Proposed Biogas Renewable Generation Project Draft EIR written comments
Date: Wednesday, September 30, 2020 10:50:25 AM
Attachments: Bissonnette Written Commnents on Proposed Biogas Renewable Generation Project Draft EIR .pdf

---

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Dear Erik Krause,

I hope this finds you well. Please find attached my comments on Proposed Biogas Renewable Generation Project Draft EIR.

Thanks,

Matt Bissonnette

Matthew Bissonnette
2412 Sleepy Hollow Drive
Glendale, CA
91206

September 29, 2020

Dear Erik Krause,

I hope this finds you and your family well in these strange times. I am writing to you about the DEIR for the Biogas Renewable Generation Project at the Scholl Canyon Landfill. I am a ten year resident and homeowner in Glen Oaks Canyon. My wife and I have two children, and we are, of course, very concerned about their health and safety, and about the health and safety of our friend and neighbors in the canyon and surrounding areas. In general, I would like the City of Glendale to come up with the cleanest, safest solution to dealing with the gas at Scholl Canyon Landfill. Specifically, I have read through the DEIR, and have the following thoughts and comments.

L140-1

Landfill Closure - The landfill will reach capacity in 2028. Per the long stated goal of turning the area to recreational use, all plans for use/treatment of gas from the Landfill should have this as their primary goal and desired outcome: that is to say, Landfill closed by 2028, and converted to recreational use.

L140-2

Flaring - Any and all flaring at the Landfill, now or in future, should use the highest quality flares. It is my understanding that older, inefficient flares are now being used, resulting in more pollutants and toxins being released into the surrounding environment. It is also my understanding that the nearest air quality monitors are over four miles away, so there is no way of measuring the actual amount of toxins and pollutants being released into the nearby residential neighborhoods. Proper flaring and air quality monitoring are needed.

L140-3

Air Quality - The DEIR anticipates that there will be pollutants and toxins released into the surrounding environment that exceed South Coast Air Quality Management District's (SCQAMD) limits. Apparently these excesses will be offset/mitigated on paper, but still breathed in by Glendale residents. Further, the DEIR does not address possible release of dioxins, furans, and other toxins, which again would affect local residents. The health and safety of local residents should be the primary concern when considering air quality and other environmental impacts.

L140-4

Fire and Earthquake - Scholl Canyon Landfill is in a very high fire danger zone. Glen Oaks Canyon and the surrounding areas are residential neighborhoods. Glen Oaks Canyon has only one access road in and out. The DEIR assumes that the dangers from fire and earthquake are not substantial and/or sufficient to warrant concern. If the fire season of 2020 has taught California anything, it is that ALL our assumptions about wildfires, and the dangers they present, need to be very seriously re-examined.

L140-5

Building an industrial gas generation project, in a very high fire zone, which is also residential, which has very limited access in and out, must surely be one of those things that warrant a very, very serious re-examination.

In September alone, there have been over six fires in the Canyon area. This weekend, as I was composing this note, there were vegetation fires on Glen Oaks Canyon Drive on both Friday and Saturday nights. There was an earthquake the weekend before. And the weekend before

L140-5 that there was a fire at the Landfill. To state the new obvious, no-one can forecast, with any degree of certainty, what the fire and earthquake dangers will be in the immediate and not so immediate future for the Scholl Canyon Landfill area. To embark on such a project, in a time of such uncertainly, with the very real possibility of terrible tragedy and loss of life, is very hard to understand, and to be frank, I'm shocked that it is still being considered. The safety of local residents, and any increased dangers from wildfire and earthquake caused by any School Canyon Landfill project, should be the only concern when considering any such project.

L140-6 **Noise, Traffic, Eye Sore -** The proposed project will be noisy, will apparently run 24/7, will increase traffic, and it will be ugly. None of these are good things.

L140-7 **Alternatives -** The tuning, conversion, and sale of the Landfill gas to The Gas Company (for example), is a cleaner and safer alternative, but it is not properly considered in the DEIR. Flaring, using high quality flares, would also be cleaner and safer, but was also not properly considered in the DEIR. Cleaner and safer alternatives exist, and they should be pursued.

L140-8 In conclusion, I understand from the DEIR that there are certain possible financial gains, and potential energy credits, that are being considered as determinative factors in evaluating the Biogas Renewable Generation Project at the Scholl Canyon Landfill. As I've argued and suggested above, the health and safety of local residents and the environment, should be the determinative factor when evaluating this project. This is in keeping with common sense, and the CEQA Guidelines § 15126.6(b) for such projects. Thank you for considering these thoughts and comments.

Yours,



Matthew Bissonnette

L141

From: miri hindes
To: Krause, Erik
Subject: Fwd: NO BIOGAS PROJECT
Date: Wednesday, September 30, 2020 11:38:50 AM

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>
> Dear Eric Krause:
>
> We as citizens and homeowners in Eagle Rock OBJECT to efforts by GWP to construct a gas plant in Scholl Canyon.
>
> The 3 main reasons are:
L141-1 > -severe fire danger to my community
>
> -neglecting alternative ideas
>
> -and refusing to close Scholl Dump, a known hazard.
>
> Start over instead of proceeding with a responsible plan.
> Sincerely,
> Miri Hindes
>
> Sent from my iPhone

L142

From: Mitchell Rubinstein
To: Krause, Erik
Subject: Scholl Canyon Biogas project
Date: Wednesday, September 30, 2020 6:42:34 AM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

L142-1 I am writing this in opposition of the proposed biogas project and accompanying DEIR related to the Scholl Canyon Landfill. I live in Glenoaks Canyon and think this proposal is irresponsible and dangerous to the residents surrounding the landfill. There are many reasons to object this proposal, but to me, the single issue that is the most

L142-2 concern is that as we watch over 3 million acres burn throughout California, and watch in horror as homes are burned and lives are lost, how can we contemplate building a biogas plant in a fire zone. I am unable to get proper fire insurance except through the state because of where I live in Glendale, how can the city think about putting a biogas plant in the same area.

L142-3 I wholehearted object to this proposal and hope that the city considers abandoning this project.

Mitchell Rubinstein
2300 Gardner Pl.
Glendale, CA 91206
818-437-9666

L143

From: Nate Hayward
To: Krause, Erik
Subject: Councilmember-elect Kevin de Leon"s Comments on the Draft EIR for the Scholl Canyon Biogas Renewable Generation Project
Date: Wednesday, September 30, 2020 3:57:58 PM
Attachments: KevindeLeónSchollCanyonDEIRLetter.pdf

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Hello,
Please see the attached letter from Councilmember-elect Kevin de León regarding the Draft EIR for the Scholl Canyon Biogas Renewable and Project.

Thank you,

Nate Hayward
Capital Projects Director
Office of Councilmember-elect Kevin de León
200 N. Spring Street, Suite 465
Los Angeles, CA 90012
cell: (323) 383-4906
e-mail: nate.hayward@lacity.org

PRESIDENT PRO TEMPORE EMERITUS KEVIN DE LEÓN

September 30, 2020

Erik Krause, Deputy Director of Community Development
City of Glendale
633 East Broadway, Room 103
Glendale, California 91026

RE: Biogas Renewable Generation Project Draft EIR

Dear Mr. Krause,

L143-1 As the Councilmember-elect for Los Angeles City Council District 14 (CD 14), I am deeply concerned about the City of Glendale's proposed Biogas Renewable Generation Project at the Scholl Canyon Landfill.

L143-2 As our rapidly changing climate breathes new ferocity into California's record-breaking wildfires, filling the air with hazardous and life-threatening particulates and toxins on top of the poisonous fumes already generated by traffic on the four major freeways that surround the Eagle Rock community (I-5, SR 110, SR 2, and SR 134) – we have a responsibility to the residents of our neighboring cities to *reduce* the criteria pollutants found in the air we all breathe, not increase them.

L143-3 That's why it is concerning that the Draft Environmental Impact Report (DEIR) for the project glosses over any analysis or assessment of how Glendale Water & Power's (GWP) plans for increased solid waste capacity at the landfill, and the sheer volume of high-polluting vehicle trips into and out of the area, will only amplify the existing noise and air pollution that plague our community. GWP's plan to flare off methane from the new biogas facility is short-sighted, and their failure to explore more responsible mitigation efforts reveals an inappropriate focus on revenue and a disregard for the residents of Glendale and Eagle Rock.

L143-4 While I have many concerns about the thoroughness and accuracy of the DEIR, I am fundamentally disappointed that GWP put forth a plan that not only runs counter to the concerns expressed by Eagle Rock and Glendale residents for decades, as clearly outlined in the letter sent by Los Angeles' Chief Legislative Analyst, but also looks to expand, under the guise of mitigation, the operations of a landfill that should have been closed four decades ago.

L143-5 As the author of SB 100, the most aggressive clean energy mandate in the nation that put our state on the path to 100% clean energy by the year 2045, I am keenly aware of how important it is to advance the construction of renewable energy sources with a sense of urgency and intentionality. However, this project violates the intent of that law, potentially wasting an opportunity for thoughtful collaboration between Los Angeles and Glendale on clean energy projects that respect the spirit of SB 100 and benefit our local communities.

L143-6 Beginning with the release of a Draft EIR to expand the Scholl Canyon Landfill back in 2014, it has become abundantly clear that GWP is more concerned about the dwindling life expectancy of the landfill, working to protect the consistent revenue it provides, than it is about the health and safety of adjacent residents or our local and regional commitments to environmental justice.

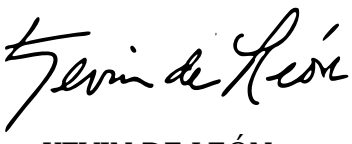
L143-7 At the current rate, the landfill is expected to reach its capacity in 2030 - just nine short years away. Instead of cutting corners to expand a landfill in such precariously close proximity to families in Eagle Rock and Glendale - a project that I doubt would pass muster in the current era - GWP would do well to focus on new methods of waste management that don't jeopardize the communities of CD 14.

L143-8 We need to pursue mitigation efforts in the next nine years leading up to Scholl Canyon's estimated closure. However, I unequivocally oppose any approach that would prolong the life of the landfill, exacerbate residents' health risks, or increase regional greenhouse gas emissions.

L143-9 I have nothing but respect for the Mayor of Glendale and Glendale City Council and feel strongly that the Scholl Canyon Landfill is an opportunity for collaboration between our two cities. Together we can honor our commitments to environmental justice and do right by the residents of Glendale and Eagle Rock who have been forced to cede beautiful recreational space to waste for about four decades too long.

L143-10 As it currently stands, I am strongly object to the proposal outlined in the draft EIR; and I urge GWP and the City of Glendale to partner with the City of Los Angeles in a joint effort to develop a mitigation plan that honors our shared climate goals and the wellbeing and wishes of Eagle Rock and Glendale residents alike.

Sincerely,



KEVIN DE LEÓN
Councilmember-elect, 14th Council District of the City of Los Angeles

L144

DEAR MR. KRAUSE,

L144-1 I'm writing to you about the proposed Biogas being discussed to potentially be built at the Scholl Canyon dump.

L144-2 It seems every 4 to 5 years we residents a "SENSITIVE RECEPTORS" are forced to defend from the City of Glendale and its planning, w consistently disregards our lives AND HEA This ongoing environmental injustice, whi impacts six densely populated neighborhoo Glendale, Eagle Rock and Pasadena, appears be of little concern to the city, who must vie residents as expendable in the pursuit of a dirty solution. I IMPLORE YOU TO THINK OF CHILDREN, MY NEIGHBORS AND THEIR FAMILI END THIS BIOGAS PLANT DISCUSSION!! Pursue

L144-3 cleaner, safer, even if more expensive, solut a less densely populated area. Within two of his proposed power plant are tens of sc (including the ones both of my children atte In addition there are multiple hospitals - al with sensitive receptors aka PEOPLE! We already dealing with drag racing on GLENOAKS BLVD, t threat of toxic waste and pollution from an un dump, we need better solutions to minimize these not more. DO IT FOR THE NEXT GENERATION NO MORE SHORTCUTS! STOP the expansions and plant!

REGARDS AD
PATRICIA [illegible]

CONOANS BLVD.
A 91206



Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91206-4386

91206

==========fold==========

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L145

From: Rebecca Addelman
To: Krause, Erik
Subject: PUBLIC COMMENT on the DRAFT EIR
Date: Wednesday, September 30, 2020 3:02:21 PM
Attachments: Scholl Canyon Letter RA.pdf

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Hello Mr. Krause,

L145-1 Please find attached my written comments on the draft EIR, and the many concerns my family, community and I have with the proposal as it currently stands.
We are residents of Glenoaks/Scholl Canyon.

Thank you for your time,
Rebecca Addelman

September 30, 2020

Dear Erik Krause,

I hope this finds you and your families well in these strange times. I am writing to you about the DEIR for the Biogas Renewable Generation Project at the Scholl Canyon Landfill. I am a ten year resident and homeowner in Glen Oaks Canyon. My husband and I have two children, and we are, of course, very concerned about their health and safety, and about the health and safety of our friend and neighbors in the canyon and surrounding areas. In general, I would like the City of Glendale to come up with the cleanest, safest solution to dealing with the gas at Scholl Canyon Landfill. Specifically, I have read through the DEIR, and have the following thoughts and comments.

L145-2

Landfill Closure - The landfill will reach capacity in 2028. Per the long stated goal of turning the area to recreational use, all plans for use/treatment of gas from the Landfill should have this as their primary goal and desired outcome: that is to say, Landfill closed by 2028, and converted to recreational use.

Flaring - Any and all flaring at the Landfill, now or in future, should use the highest quality flares. It is my understanding that older, inefficient flares are now being used, resulting in more pollutants and toxins being released into the surrounding environment. It is also my understanding that the nearest air quality monitors are over four miles away, so there is no way of measuring the actual amount of toxins and pollutants being released into the nearby residential neighborhoods. Proper flaring and air quality monitoring are needed.

Air Quality - The DEIR anticipates that there will be pollutants and toxins released into the surrounding environment that exceed South Coast Air Quality Management District's (SCQAMD) limits. Apparently these excesses will be offset/mitigated on paper, but still breathed in by Glendale residents. Further, the DEIR does not address possible release of dioxins, furans, and other toxins, which again would affect local residents. The health and safety of local residents should be the primary concern when considering Air quality and other environmental impacts.

Fire and Earthquake - Scholl Canyon Landfill is in a very high fire danger zone. Glen Oaks Canyon and the surrounding areas are residential neighborhoods. Glen Oaks Canyon has only one access road in and out. The DEIR assumes that the dangers from fire and earthquake are not substantial and/or sufficient to warrant concern. If the fire season of 2020 has taught California anything, it is that ALL our assumptions about wildfires, and the dangers they present, need to be very seriously re-examined.

Building an industrial gas generation project, in a very high fire zone, which is also residential, which has very limited access in and out, must surely be one of those things that warrant a very, very serious re-examination.

In September alone, there have been over six fires in the Canyon area. This weekend, as I was composing this note, there were vegetation fires on Glen Oaks Canyon Drive on both Friday and Saturday nights. There was an earthquake the weekend before. And the weekend before that there was a fire at the Landfill. To state the new obvious, no-one can forecast, with any degree of certainty, what the fire and earthquake dangers will be in the immediate and not so immediate future for the Scholl Canyon Landfill area. To embark on such a project, in a time of such uncertainly, with the very real possibility of terrible tragedy and loss of life, is very hard to understand, and to be frank, I'm shocked that it is still being considered. The safety of local

residents, and any increased dangers from wildfire and earthquake caused by any School Canyon Landfill project, should be the only concern when considering any such project.

Noise, Traffic, Eye Sore - The proposed project will be noisy, will apparently run 24/7, will increase traffic, and it will be ugly. None of these are good things.

L145-2 **Alternatives -** The tuning, conversion, and sale of the Landfill gas to The Gas Company (for example), is a cleaner and safer alternative, but it is not properly considered in the DEIR. Flaring, using high quality flares, would also be cleaner and safer, but was also not properly considered in the DEIR. Cleaner and safer alternatives exist, and they should be pursued.

In conclusion, I understand from the DEIR that there are certain possible financial gains, and potential energy credits, that are being considered as determinative factors in evaluating the Biogas Renewable Generation Project at the Scholl Canyon Landfill. As I've argued and suggested above, the health and safety of local residents should be the determinative factor when evaluating this project. Thank you for considering these thoughts and comments.

Yours,

Rebecca Addelman

L146

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L146-1 Due to the concern of it only being located 1/2 mile from the Verdugo Hills Fault which has the potential to cause a 6.7 magnitude earthquake, I do not wish for this project to move forward.

Thank you.

Sincerely,

Pat. 2

Robinson Wills, Age 20
2613 E. Glenoaks Blvd.

Place
Stamp
here

Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

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==========fold==========

L147

From: Sergio Keusayan
To: Krause, Erik
Subject: BioGas Renewable Gen. Project DEIR Comments
Date: Wednesday, September 30, 2020 6:59:28 AM

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Mr Krause,

I hope my email finds you well. It's unfortunate that I find myself reviewing and commenting on yet another DEIR for a proposed project at Scholl Landfill, Glendale's Trash Dump. The landfill is surrounded on all sides by beautiful residential communities, schools, recreational facilities, etc. It's time the City of Glendale stops focusing on profits and green energy credits, and makes the health and safety of its residents top priority. I oppose the Biogas Renewable Gen. Project for the following reasons:

L147-1

Wildfire is a huge risk to Glenoaks and Chevy Chase Canyons, as well as to the nearby Linda Vista and Eagle Rock neighborhoods, most of which have narrow, single-access roads. Adding an above-ground 3,500 feet long natural gas pipeline and generating electricity will increase the fire risk in an already very high fire hazard zone. Because of its location in a Very High Fire Hazard Zone and with Earthquake fault lines going through it, the landfill should not be further industrialized for profit, but plans should be put in motion to shut down the landfill by 2028 and process the methane in the most environmentally conscious manner.

The wildfire plan in the DEIR minimizes the danger and carelessly assumes that an on-site water tank and a fire department more than five miles away are sufficient. In my last 9 years as a resident in Glenoaks Canyon, we have twice been evacuated from our home due to fire. In fact, there was a fire AT the landfill earlier this month, September 2020.

Air Quality: According to the DEIR, 4.2.1.5 Existing Air Quality

"The closest monitoring station to the proposed Project site is located in Pasadena, approximately four miles southeast in Los Angeles County. Data for pollutants that are not monitored at this station, such as SO2, PM10, and lead, are taken from the Los Angeles-North Main Street monitoring station. The second site was chosen based on proximity and general wind direction in relation to the Scholl Canyon Landfill. The Los Angeles-North Main Street monitoring station is located approximately six miles south of the proposed Project site."

The greatest adverse health impact from environmental toxins and pollutants is experienced by individuals within a 2 mile radius of the landfill. Therefore, what is the logic in placing the Air Quality monitoring devices 4 miles and 6 miles out from the landfill, instead of within a 2 mile radius? It appears that perhaps the reason in placing the sensors so far out might not have much to do with wind direction (as the wind must first pass through the first 2 miles in order to reach the next 4 miles), but perhaps it's a way to skew the data, because less toxins and pollutants will reach the

4 and 6 mile radius boundary, than a radius within 2 miles from the source. What say you?

By now, steps should have been taken to place Air Quality monitoring devices/sensors within a 2 mile radius of the landfill and proposed site of the Biogas Renewable Gen. Project. Over the course of the last 6 years, members of Coalition for Landfill Alternatives (CSLA) have repeatedly brought this concern to the attention of City Staff, specifically to Steve Zurn, and asked for Air Quality Monitoring Sensors/Devices be placed within Glenoaks Canyon and Surrounding areas, within a 2 mile radius of the landfill.

1). Are there now Air Quality Monitoring Sensors/Devices within a 2 mile radius of Scholl Canyon Landfill?

2). If so, why were the results of sensors within a 2 mile radius not used to evaluate the Air Quality in this DEIR?

3). If not, what is the reason for not placing Air Quality Monitoring Sensors/Devices within a 2 mile radius of the landfill and proposed site of the Biogas Renewal Gen. Project?

L147-1

I am also concerned about the unhealthy and dangerous emissions the plant will produce to pollute the air we breathe. There are cleaner solutions to burning the methane and we ask you to consider them.

Pollution from the project will exceed the South Coast Air Quality Management District (SCQAMD) thresholds for four contaminants, but the DEIR does not discuss either mitigation or using the best available control technology (BACT).

This is NOT a green project. The priority reserve credits that GWP hopes to receive make it green on paper, but it is NOT green for our lungs, our bodies, our children, or our neighborhoods. Priority reserve credits do not automatically erase the actual number of pollutants and toxins released by this proposed project.

The DEIR also ignores carcinogenic pollutants such as dioxins and furans.

Geology and Soils: The project will be located atop a mountain that sits near a potential 6.7 earthquake fault. Seismic waves on a mountain can be amplified to 4 or 5 times the strength of field waves, and the report both proposes insufficient mitigation measures for threats to power equipment, buildings, tanks, and pipelines and fails to present emergency back-up systems to mitigate damage from earthquakes or fire.

We all got a wake-up call just before midnight on Friday, September 18. The earthquake was a relatively mild one, but it still shook vigorously and for a long time. How would the proposed power plant stand up to a quake directly beneath it? The DEIR doesn't even address that possibility.

The DEIR does not address closure plans for the landfill. Promises to close the landfill and return it to recreational use have been made and broken many times in the past. I urge the City of Glendale and the LA Sanitation District to put into effect closure plans for the landfill and close it by 2028.

Thank you,

Sergio Keusayan
2280 Hollister Terrace
Glendale, CA 91206

L148

From: Alina Mullins
To: Krause, Erik
Cc: Jillian Wong; Lijin Sun
Subject: South Coast AQMD Staff"s Comments on Draft EIR for the Proposed Biogas Renewable Generation Project (SCH No.: 2017081062)
Date: Wednesday, September 30, 2020 3:17:52 PM
Attachments: LAC200708-27 DEIR Biogas Renewable Generation Project_20200930.pdf

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Dear Mr. Krause,

L148-1 Attached are South Coast AQMD staff's comments on the Draft Environmental Impact Report (Draft EIR) for the Proposed Biogas Renewable Energy Generation Project (SCH No.: 2017081062) (South Coast AQMD Control Number: LAC200708-27).

Thank you,
Alina

Alina Mullins
Air Quality Specialist, CEQA IGR
Planning, Rule Development & Area Sources
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
P. (909) 396-2402
E. amullins@aqmd.gov
**Please note that South Coast AQMD is closed on Mondays. Additionally, in response to COVID-19, our building is currently closed to the public and I am working remotely. I will be responding to emails and voice messages during my scheduled work hours, Tuesday through Friday 7:00 am to 5:30 pm.*

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:
ekrause@glendaleca.gov
Erik Krause, Deputy Director
City of Glendale, Community Development Department
633 East Broadway, Suite 103
Glendale, California 91206

September 30, 2020

Draft Environmental Impact Report (Draft EIR) for the Biogas Renewable Generation Project (Proposed Project) (SCH No.: 2017081062)

South Coast Air Quality Management District (South Coast AQMD) is a Responsible Agency for the Proposed Project [California Environmental Quality Act (CEQA) Guidelines Section 15381) since implementation of the Proposed Project requires permits from South Coast AQMD. In 2017, South Coast AQMD received 11 permit applications [Application Numbers (A/N): 595659, 595660, 595661, 595662, 595663, 595664, 595665, 595666, 595667, 595669, and 595670] related to the Proposed Project (South Coast AQMD Facility ID No.: 162556).

L148-2

South Coast AQMD staff understands that the City of Glendale as the CEQA Lead Agency for the Proposed Project is relying on the air quality analysis in the Draft EIR to satisfy the CEQA requirements for these permits, and it is generally the same air quality analysis that was done in the previously released Mitigated Negative Declaration (MND). South Coast AQMD staff previously submitted comments on the MND put forward by the Lead Agency in October 2017 for the Proposed Project[1], which involved a 12-megawatt power generation facility that would utilize landfill gas (LFG) as fuel to generate renewable energy. In March 2019, the Lead Agency initiated the preparation of a Draft EIR for the Proposed Project and released the Draft EIR for public review and comments in July 2020.

Based on a review of the Draft EIR, supporting technical documents, and permit applications for the Proposed Project, South Coast AQMD staff has three main comments. A summary of these comments is provided as follows with additional details in Attachment A. Additionally, the Draft EIR did not fully respond to or address South Coast AQMD staff's comments in the submitted comment letter on the MND, which is incorporated by reference in Attachment B.

L148-3

1. CEQA Air Quality and Health Risk Impacts from the Regenerative Gas Flare: The Lead Agency submitted a permit application (A/N: 595670) for a flare that would incinerate regenerative off-gases, which result from the LFG treatment system and occur prior to combusting LFG in the reciprocal engine generators to generate electricity. The Lead Agency did not analyze the air quality impacts from the regenerative gas flare in the Draft EIR and should include the analysis in the Final EIR. Without this analysis, South Coast AQMD will not be able to issue the permit for this flare.

[1] South Coast AQMD staff. October 17, 2017. Accessed at: http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2017/mnd-schollcanyon-101717.pdf.

2. Worker Receptor Locations for the Health Risk Assessment: The health risk assessment in the Draft EIR did not include the workers located within the Scholl Canyon Landfill site as a receptor. The Proposed Project is located on a 2.2-acre portion of the 95-acre Scholl Canyon Landfill site that includes operations of four other South Coast AQMD-permitted facilities, each with a different facility identification number. Workers at these other facilities are considered worker receptors because they work at separate facilities, different from the workers at the Proposed Project. Therefore, the Lead Agency should analyze the Proposed Project's health risk impacts to the workers located within the Scholl Canyon Landfill site in the Final EIR.

L148-4

3. Air Dispersion Modeling Parameters: The background concentrations used to determine the ambient air quality at the Proposed Project were from years 2014 to 2018. The background concentrations during this time period were not a true representation of the existing conditions since LFG used to be sent to the Grayson Power Plant to burn in boilers before April 1, 2018, and the first full year of combusting LFG at the Scholl Canyon Landfill site was in year 2019. Therefore, the Final EIR should include the use of 2019 air quality data as background. Additionally, in the air dispersion modeling performed in the Draft EIR, the facility boundary included the area for a publicly accessible park and should be adjusted to exclude that area in the Final EIR.

L148-5

In conclusion, the Draft EIR did not analyze the air quality and health risk impacts from the regenerative gas flare, which is a part of the Proposed Project, and likely underestimated the health risk impacts to workers employed by other South Coast AQMD-permitted facilities at the Scholl Canyon Landfill site. South Coast AQMD staff recommends that the Lead Agency revise the analysis in the Final EIR to correct the deficiency and lack of analysis of the regenerative gas flare, and revise the health risk assessment and air dispersion modeling to fully disclose the Proposed Project's air quality and health risk impacts.

L148-6

In its current form, the Draft EIR is not adequate for South Coast AQMD's use in issuing the associated air quality permits and the Final EIR needs to fully address the deficiencies identified in this comment letter. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please feel free to contact me at lsun@aqmd.gov, if you have questions or wish to discuss the comments.

L148-7

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

Attachments:
Attachment A – South Coast AQMD staff's detailed comments on the Draft EIR
Attachment B – South Coast AQMD staff's comments on the previously released MND, dated October 17, 2017

LAC200708-27
Control Number

L148-A

ATTACHMENT A

South Coast AQMD Staff's Detailed Comments on the Draft EIR

South Coast AQMD Staff's Summary of Project Description in the Draft EIR

The Lead Agency is proposing to demolish existing landfill gas treatment equipment and build a 12-megawatt power generation facility that would utilize landfill gas (LFG) as fuel to generate renewable energy (Proposed Project). The Proposed Project will also include a one-mile natural gas pipeline, a one-mile water pipeline, two 70,000-gallon water tanks, and an LFG treatment system. The Proposed Project is located on a 2.2-acre portion of the 95-acre Scholl Canyon Landfill site that is owned by Los Angeles County within the City of Glendale. L148-A-1

In addition to the Proposed Project (South Coast AQMD Facility ID No.: 162556), four other South Coast AQMD-permitted facilities operate at the Scholl Canyon Landfill site[2]. Each has a separate facility identification number (South Coast AQMD Facility ID Nos.: 37361, 45262, 103426, and 192443) that is different from that of the Proposed Project. Existing operations at the Proposed Project include collection, incineration, and flaring of LFG by the Los Angeles County Sanitation District (South Coast AQMD Facility ID No.: 45262)[3].

The Proposed Project will be constructed in three phases over a 15- to 18-month period. Once operational, the Proposed Project will include four reciprocating internal combustion engines (RICEs), four selective catalytic reduction (SCRs) systems, a regeneration ground flare, an LFG treatment system, and an aqueous ammonia storage and transfer system[4]. South Coast AQMD staff understands that existing on-site flare stacks will not be demolished and will likely be used intermittently as backup devices to incinerate and flare LFG not utilized by the Proposed Project[5]. The life of the Proposed Project is anticipated to be 20 years, or as long as LFG can be used to generate electricity[6].

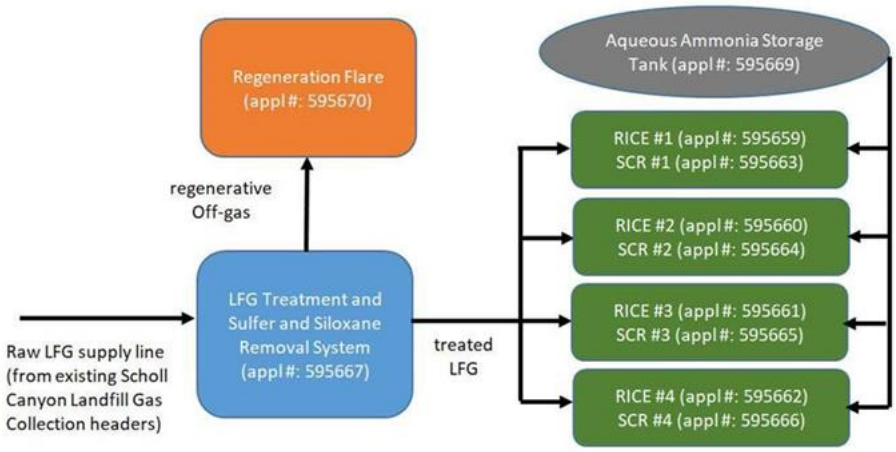
South Coast AQMD Staff's Summary of Permit Applications

South Coast AQMD received 11 permit applications for the Proposed Project. The Proposed Project will take raw LFG from the existing Scholl Canyon Landfill and send it through an LFG treatment system where the regenerative off-gases from the treatment process will be sent to a regenerative flare to be incinerated. Treated LFG will then be sent to four RICEs to generate electricity (Figure 1). Each RICE will be equipped with an SCR and oxidation catalyst unit using aqueous ammonia and oxygen to minimize the emissions of nitrogen oxides (NOx) emissions (Table 1). L148-A-2

[2] South Coast AQMD. Facility INformation Detail (F.I.N.D). Accessed at: http://www.aqmd.gov/nav/FIND.
[3] Draft EIR. Section 2.0. Page 2.1.
[4] *Ibid.* Pages 2.5 to 2.7.
[5] *Ibid.* Section 4.2. Page 4.61.
[6] *Ibid.* Page 2.17.

L148-A-2

Figure 1 – Process Flow Chart*



NOTE: *appl# stands for South Coast AQMD permit application number
Prepared by South Coast AQMD staff. September 17, 2019.

Table 1 – Brief Descriptions of the South Coast AQMD Permit Applications related to the Proposed Project

	Application Number	**Proposed Equipment and Process**	**Brief Description**
1	595659	Construction and operation of a 4,183-horsepower RICE #1	Operate 24 hours per day, seven days per week using LFG as fuel, augmented by natural gas as an additional fuel source at a maximum of 10 percent
2	595660	Construction and operation of a 4,183-horsepower RICE #2	Same as RICE #1
3	595661	Construction and operation of a 4,183-horsepower RICE #3	Same as RICE #1
4	595662	Construction and operation of a 4,183-horsepower RICE #4	Same as RICE #1
5	595663	SCR #1	A homogenous honeycomb selective catalytic reduction unit that would operate 24 hours per day, seven days per week using a 19 percent aqueous ammonia solution as a reducing agent. A homogenous honeycomb oxidation catalyst is also proposed.
6	595664	SCR #2	Same as SCR #1
7	595665	SCR #3	Same as SCR #1
8	595666	SCR #4	Same as SCR #1
9	595667	LFG treatment and sulfur and siloxane removal system	It consists of vessels containing media that capture the sulfur/siloxane and remove it from the LFG
10	595669	Aqueous ammonia storage tank	An aboveground aqueous ammonia storage and transfer system that would hold a 19 percent aqueous ammonia solution
11	595670	Regeneration flare	A landfill and digester gas fired flare (non-emergency, enclosed) that is not used to combust LFG but is used for the LFG from the cleanup skids

South Coast AQMD Staff's Summary of the Air Quality Analysis and Health Risk Assessment in the Draft EIR

In the Air Quality Analysis Section of the Draft EIR, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's regional and localized construction air quality impacts would be less than significant[7]. The Proposed Project's net new regional operational emissions of NOx and volatile organic compounds (VOCs) would be reduced to below South Coast AQMD's regional air quality CEQA significance thresholds for operation with allocation of emissions offsets issued from the Priority Reserve[8]. However, the Proposed Project's regional operational emissions of carbon monoxide (CO) cannot be reduced to less than significant with allocation of emissions offsets issued from the Priority Reserve and would remain significant and unavoidable. The Lead Agency also quantified health risks from the operation of the RICEs on resident and worker receptors located outside the Scholl Canyon Landfill site. The maximum individual cancer risk would be less than 1 in a million[9], which is below South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk.

L148-A-3

South Coast AQMD Staff's Detailed Comments on the Draft EIR

South Coast AQMD staff's detailed comments on the Draft EIR's air quality analysis and health risk assessment are provided as follows.

1. CEQA Air Quality and Health Risk Impacts from the Regenerative Gas Flare

As shown in Table 1, South Coast AQMD received the permit application (A/N: 595670) for the regenerative gas flare. The Lead Agency identified the need for the regenerative gas flare to incinerate off-gases from the LFG sulfur and siloxane removal system in the MND[10], submitted this permit application in 2017, and provided South Coast AQMD staff information about this flare[11]. At the time of the release of the Draft EIR, the Lead Agency did not withdraw or make any changes to the permit application (A/N: 595670). Therefore, the regenerative gas flare is a component of the Proposed Project.

L148-A-4

The regenerative gas flare is a landfill and digester gas fired flare. As illustrated in Figure 1, the Proposed Project would include an LFG treatment system that uses carbon absorbers that are periodically regenerated and vented to the new regenerative gas flare. According to the South Coast AQMD permit application (A/N: 595670), flaring of regenerative off-gases will take place eight hours a day, four days a week, and 52 weeks a year.

Although the Draft EIR discusses the use of a ground flare to dispose the regeneration gas, the Lead Agency did not fully describe the regenerative gas flare in the Project Description or analyze the associated air quality and health risk impacts in the Draft EIR. Regenerative off-gases will be generated from implementation of the Proposed Project's LFG treatment system and are not currently being flared. The regenerative gas flare is also different from the exiting

[7] *Ibid* Pages 4.56 to 4.59.
[8] *Ibid.* Pages 4.61 to 4.63.
[9] *Ibid.* Page 4.101.
[10] MND. 2017. Section 3.3 Air Quality. Page 3.3.22. Accessed at: http://glendalebiogasgeneration.com/#final-mnd.
[11] E-mail correspondence. October 2017. From Montrose (Lead Agency's consultant) to South Coast AQMD staff.

L148-A-4

LFG flares because the LFG treatment system that produces regenerative off-gases is undertaken and completed prior to combusting the LFG in the reciprocating engine generators. Therefore, the regenerative gas flare should not be treated as part of the existing conditions and its air quality and health risk impacts should be adequately analyzed and fully disclosed in the Final EIR before the permit for this flare can be issued.

L148-A-5

2. Worker Receptor Locations for the Health Risk Assessment

Based on a review of the air dispersion modeling files, South Coast AQMD staff found that the Lead Agency did not place any worker receptors within the Scholl Canyon Landfill site. This is not appropriate. The Proposed Project is located on a 2.2-acre portion of Scholl Canyon Landfill site that encompasses 95 acres and includes operations of four other South Coast AQMD-permitted facilities, each with a different facility identification number. While the fenceline notes the areas which are considered ambient air due to public access restrictions, workers at these other facilities are not considered on-site workers for the Proposed Project and should be analyzed as worker receptors. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the air dispersion modeling to place worker receptors at the locations of other South Coast AQMD-permitted facilities within the Scholl Canyon Landfill site, calculate the cancer risk to the workers at these locations, and compare the calculated cancer risk to South Coast AQMD's CEQA significance threshold of 10 in one million to determine the level of significance in the Final EIR.

3. Air Dispersion Modeling Parameters

To analyze the Proposed Project's localized operational air quality and health risk impacts, the Lead Agency performed air dispersion modeling in the Draft EIR. South Coast AQMD staff recommends that the Lead Agency revise the modeling parameters based on the following comments.

L148-A-6

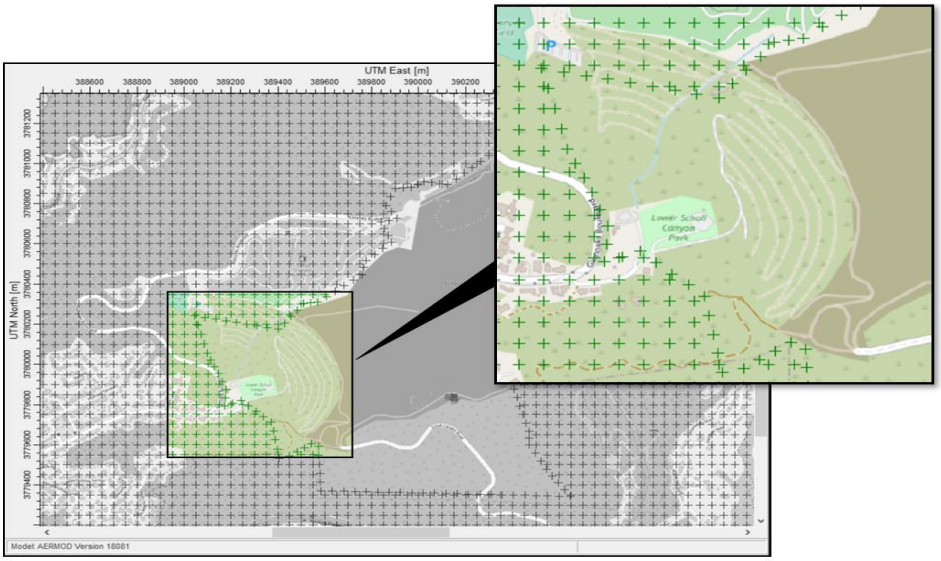
a) Background concentrations are added to the project's predicted air quality concentrations and CEQA significance is based on whether the total concentration will result in a violation of the National Ambient Air Quality Standards (NAAQS), or make an existing violation of the NAAQS worse. In the Draft EIR, the Lead Agency used the background concentrations from years 2014 to 2018[12]. During this time period, the Lead Agency sent LFG to the Grayson Power Plant (Grayson) to burn in boilers. Since April 1, 2018, the Lead Agency ceased combusting LFG at Grayson and has been flaring all LFG at the Scholl Canyon Landfill site[13]. Background concentrations from years 2014 to 2018 do not provide an accurate depiction of the existing condition at the time of the release of the Notice of Preparation in 2019 since the first full year of combusting all LFG at the Scholl Canyon Landfill was in year 2019. Therefore, to accurately characterize the Proposed Project's ambient air quality impacts, South Coast AQMD staff recommends that the Lead Agency update the analysis in the Final EIR using the 2019 air quality data[14] as background.

[12] Draft EIR. Section 4.2. Page 4.64.
[13] *Ibid.* Section 2.0. Page 2.1.
[14] South Coast AQMD. Historical Data by Year. Accessed at http://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year.

b) As illustrated in Figure 2, the facility boundary used in the air dispersion model includes an area for the Lower Scholl Canyon Park (Park). As such, no sensitive receptors (denoted by the green "+" symbols) were placed within the Park boundary. This is not appropriate. The Park has three picnic structures, two playgrounds, and a public parking lot[15]. Because the general public has access to the Park, receptors should have been placed within the Park as it is considered to be ambient air. As such, South Coast AQMD staff recommends that the Lead Agency revise the facility boundary in the air dispersion modeling to exclude the area for the Lower Scholl Canyon Park from the facility boundary.

L148-A-6

Figure 2 – Illustration of Facility Boundary in Air Dispersion Model



Source: South Coast AQMD staff prepared a screenshot of Lead Agency's air dispersion model (1-hour NO2 Run) to illustrate the facility boundary used in AERMOD. September 25, 2020.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project.

L148-A-7

[15] City of Glendale Park Locator. Accessed at: https://glendalegeo.maps.arcgis.com/apps/webappviewer/index.html?id=0cf792023dfd4cd7a54d2b4b1dcae164.

L148-B

ATTACHMENT B

South Coast AQMD Staff's Comments on the Previously Released Mitigated Negative Declaration, Dated October 17, 2017

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS: October 17, 2017

djoe@glendaleca.gov
Dennis Joe, Planner
City of Glendale – Community Development Department
633 East Broadway, Room 103
Glendale, CA 91206

Mitigated Negative Declaration (MND) for the Proposed Biogas Renewable Generation Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is meant as guidance for the Lead Agency and should be incorporated into the Final MND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish the existing landfill gas collection system and construct and operate an approximately 12-megawatt power generation facility that would utilize landfill gas as a fuel to generate renewable energy (Proposed Project).

L148-B-1

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality analysis, the Lead Agency found that the Proposed Project's regional construction air quality impacts would be less than significant and that the Proposed Project's operational emissions of NOx and VOCs would be offset through the allocations from the SCAQMD Priority Reserve Credits[1]. The Lead Agency stated that "since construction and operation of a landfill gas processing facility is considered to be an essential public service, Priority Reserve credits are expected to be granted for this Project pursuant to SCAQMD Rule 1309.1 for pollutants that exceed small source thresholds"[2].

SCAQMD Staff's Comments

SCAQMD staff has comments about the air quality cumulative impacts analysis, energy input rating, compliance with SCAQMD Rules, and SCAQMD permits. Comments are provided as follows.

Air Quality Cumulative Impacts Analysis

L148-B-2

The Lead Agency considered the potential cumulative air impacts from the Grayson Power Plant Repowering project[3]. However, the Lead Agency did not consider how the Proposed Project's air quality impacts would be cumulatively affected when it is combined with the air quality impacts from the proposed Scholl Canyon Landfill Expansion project (SCH No. 2007121023). In the cumulative impacts analysis for noise, the Lead Agency found that the proposed Scholl Canyon Landfill Expansion project could cumulatively affect a nearby sensitive receptor for noise exposures[4]. Similarly, the Lead Agency found that implementation of the Proposed Project may overlap with implementation of the proposed School Canyon Landfill Expansion project causing an incremental cumulative increase in vehicle traffic at the intersections of Figueroa Street and Highway 134 ramps[5]. Therefore, to be consistent with cumulative impact analyses for noise and transportation and traffic, SCAQMD staff recommends that the

[1] MND. Page 3.3.17
[2] MND. Page 3.3.13.
[3] MND. Page 3.19.3.
[4] MND. Page 3.19.5
[5] MND. Page 3.19.6.

L148-B-2 Lead Agency disclose the potential incremental impacts on air quality from the proposed School Canyon Landfill Expansion project in the Final MND.

Energy Input Rating

L148-B-3 The criteria and toxic emissions from the Internal Combustion Engines/Cogeneration system (ICE/Cogens) is based on an energy input rating of 26.34 mmbtu/hr[6] even though the manufacturer's specified maximum energy input is rated at 23.9 mmbtu/hr[7]. Additionally, the total greenhouse gas emissions of 48,427 MT/year[8] of CO2e was based on the input rating of 95.14 mmbtu/hr, which was about four times the manufacturer's rating of 23.9 mmbtu/hr per engine. SCAQMD staff recommends that the Lead Agency revise the Air Quality analysis by using one energy input rating consistent throughout the Final MND and associated appendices.

Compliance with SCAQMD Rules

Rule 1149 – Storage Tank and Pipeline Cleaning and Degassing
Since the Proposed Project includes the abandonment of existing landfill gas pipeline from Scholl Canyon Landfill to Grayson Power Plant, SCAQMD staff recommends including a discussion to demonstrate compliance with Rule 1149 in the Final MND.

Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
L148-B-4 The scope of work and asbestos survey at this time indicates that the existing temporary/portable offices and landfill condensate/groundwater collection systems will not be disturbed, therefore are not included in the pre-demolition asbestos survey. If plans change and any of these facilities are renovated or demolished, the asbestos survey[9] will need to be amended to include any additional structures or facility components. A 10-working day notification before any demolition or renovation activities other than emergency demolition or renovation is required pursuant to Rule 1403.

Rule 1150.1 – Control of Gaseous Emissions From Municipal Solid Waste Landfills
Since the Proposed Project involves demolition and construction of a landfill gas combustion system, SCAQMD staff recommends that the Lead Agency ensure that the Proposed Project is consistent with the Rule 1150.1 Alternative Compliance Plan.

California Code of Regulation Title 13, Division 3, Chapter 9, Article 5 – Portable Engine and Equipment Registration
Portable equipment brought onsite must be registered with California Air Resources Board under the Portable Equipment Registration Program (PERP) and may not reside on the facility for greater than one year without a Permit to Operate from SCAQMD. Notification to SCAQMD of PERP equipment is required.

SCAQMD Permits

L148-B-5 Based on SCAQMD staff's review of the MND, it is foreseeable that Lead Agency will rely on the adopted MND to demonstrate CEQA compliance for the Proposed Project's permits from SCAQMD. Therefore, it is critical that the information in the permit applications filed with SCAQMD for the Internal Combustion Engines/Cogeneration system (ICE/Cogens) and associated Selective Catalytic Reduction equipment are consistent with the assumptions used in the Air Quality analysis in the MND. Moreover, since SCAQMD permits are required, SCAQMD should be identified as a Responsible Agency for the

[6] Appendix A.2.3. Page 364.
[7] Page 377.
[8] Table 3.7-3. Page 156.
[9] Appendix G – Pre-Demolition Asbestos and Lead-Based Paint Survey

L148-B-5

Proposed Project in the MND. For more information on permits, please visit SCAQMD webpage at: http://www.aqmd.gov/home/permits. For any questions on permits, please contact Mr. Ken Matsuda, Senior Air Quality Engineer, at KMatsuda@aqmd.gov or at (909) 396-2656.

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS:JC
LAC170912-01
Control Number

L149

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L149-1

OPPOSED BECAUSE OF LIVING NEAR GAS WELLS CAUSES SIGNIFICANT, ADVERSE HEALTH EFFECTS ON ADULTS & CHILDREN.

I LIVE IN GLENOAKS CANYON WHERE WE HAVE A SCHOOL, PARKS AND LITTLE LEAGUE PARKS.

WE ARE ALSO A COMMUNITY OF RETIRED PEOPLE WHO WOULD BE VERY MUCH AT RISK.

L149-2

FIRE DANGER

OUR CANYON IS JUST THAT, A CANYON. CANYONS ARE SURROUNDED BY MOUNTAINS WITH A LOT OF DRY GRASSES AND LOTS OF OAK TREES.

CANYONS CAN HAVE AN AFFECT ON THE WINDS SPEED & DIRECTION AND CAN HAVE A MAJOR AFFECT ON DIRECTION OF FIRE SPREAD AND SPEED.

Thank you.

Sincerely,

Susan Harris

SUSAN HARRIS



Susan Harris
2330 E Glenoaks Blvd
Glendale, CA 91206

SANTA CLARITA CA 913
30 SEP 2020 PM 1 L



STATION

Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

==========fold==========

91206-431128

==========fold==========

FIND

L150

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L150-1 I LIVE 2 MILE FROM THE PROPOSED BIOGAS PLANT, JUST 2 BLOCK FROM THE GLENDALE ELEMENTARY SCHOOL. BEFORE THE PANDEMIC I COULD HEAR THE STUDENTS LAUGHING & ENJOYING THEIR BREAK IN THE PLAY GROUND. THEY WILL BE BACK SOON WHEN IT'S A SAFER ENVIRONMENT FROM THE VIRUS. I HAVE CANCER, MY NEXT DOOR NEIGHBOR IS A CANCER SURVIVOR, HER NEXT DOOR NEIGHBOR IS A 105 YEARS OLD. JUST IN THE PAST TEN YEARS THERE HAVE BEEN SIX BRUSH FIRES IN OUR LITTLE CORNER OF GLENOAKS CANYON,

L150-2 I OPPOSE THE PROPOSED BIOGAS PROJECT BECAUSE STUDIES SHOW IT WILL POLUTE THE AIR MORE. THE STUDENTS WILL BE BREATHING. BECAUSE

L150-3 THIS AREA IS SUSCEPTIBLE TO BRUSH FIRES WHERE THE PLANT IS TO BE LOCATED. BECAUSE IN CASE OF FIRE & IF THE WIND IS A SANTA ANA CONDITION HOW WILL WE EVACUATE THESE HIGH RISK PEOPLE QUICKLY OUT OF OUR ONE-WAY OUT CANYON?

L150-4 WHY ADD A SHORT TERM SOLUTION & NOT CLEANER ALTERNATIVES?

Thank you.

Sincerely,

[illegible],

CANYON RESIDENT



Place Stamp here

Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

==========fold==========



==========fold==========

L151

From: Glendale Environmental Coalition
To: Krause, Erik
Subject: Comments on Proposed Biogas Renewable Generation Project DEIR
Date: Thursday, October 01, 2020 9:27:04 AM
Attachments: 2020 09 30 GEC-Sierra Club Scholl Biogas DEIR Comments.pdf

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CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Please see the attached letter re Glendale Environmental Coalition and Sierra Club comments on the DEIR for the Proposed Biogas Renewable Generation Project.

September 30, 2020

Erik Krause
Deputy Director of Community Development
City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

Via email to ekrause@glendaleca.gov

Re: **Comments on Draft Environmental Impact Report for Biogas Renewable Generation Project**

Dear Mr. Krause:

The Glendale Environmental Coalition (GEC) and Sierra Club are providing the following comments, concerns, and questions about the proposed Biogas Renewable Generation Project Draft Environmental Impact Report (DEIR), covering power generation using Scholl Canyon Landfill (SCLF) landfill gas (LFG).

L151-1 GEC is a grassroots group of residents of Glendale and surrounding areas, which was formed to advocate for clean energy and against the installation of new natural-gas-burning infrastructure at the Grayson Power Plant. GEC continues to advocate for clean energy and sound environmental and climate policy in Glendale. The Sierra Club is a grassroots environmental organization working for an equitable transition to 100% clean energy in California.

We believe that environmental stewardship requires Glendale, as the municipality that opened SCLF, continues to manage it, and controls the use of the LFG it produces, to identify and implement practices for handling the LFG that will minimize to the greatest extent possible its harmful environmental and climate impacts.

Background on the Project and Environmental Review

L151-2 According to the Draft Environmental Impact Report (DEIR), the proposed Scholl Canyon biogas generation project would involve construction and operation of a 12 MW power-generating facility burning LFG produced by the Scholl Canyon landfill. The impetus for the project and the DEIR is to decide how to handle the LFG that SCLF produces. The DEIR was prepared after the Glendale Planning Commission rejected a previously prepared mitigated

L151-2 negative declaration (MND) and recommended that an EIR be prepared to allow alternatives to the project to be analyzed.

General Comments

GEC and Sierra Club believe that the DEIR doesn't include enough information to enable decision makers in Glendale—the Planning Commission and City Council—to make an educated and fully informed decision about the proposed project. Similarly, the lack of adequate information has impeded the community from understanding the Project and potential alternatives that may exist and that would better serve the public welfare.

L151-3

The lack of information is partly a result of the parameters of CEQA review. An EIR is meant to examine environmental impacts of a project, and information that falls outside that scope need not be included. For example, the need for information about economic considerations in an EIR is limited, even though such information is crucial to an informed decision about the project. When the environmental review process doesn't provide information needed by decision makers, it's incumbent on those decision makers to request that information before they render a decision on a project.

GEC and Sierra Club believe that the Planning Commission and City Council should request full disclosure of costs for the project and alternatives to it, to allow a side-by-side cost comparison. Indirect and nonfinancial costs, such as costs and quality of life impacts of higher health burdens resulting from air pollution emitted by the project, should be provided along with direct financial costs.

The lack of information needed to fully understand the project and its environmental impacts is a major deficiency of the DEIR. The public and the City's decision makers need additional information and analysis to truly understand the environmental impacts of this Project, compare it with other alternatives that would be superior in terms of impacts on the environment and public health, and reach an informed decision about what the City should do with the LFG produced by SCLF, to best protect its citizens and the environment. We believe the City's decision makers must make this their primary responsibility and the ultimate goal of any project dealing with the landfill gas.

Project Description

The project description is inadequate to allow a full evaluation of the Project and its environmental impacts, because it lacks some crucial information and includes some inaccurate information.

L151-4

The project description doesn't include information about the composition of the LFG before and after treatment to prepare it for combustion in the proposed generating units. For example, the DEIR doesn't explain the extent of treatment needed to allow the LFG to be combusted in the project's engines, including the amounts of sulfur and siloxane that will need to be removed and the amounts that will remain. Nor does it include any costs associated with this operation.

L151-5 Inaccuracies include the description of the role the flaring system will play during the life of the Project. The DEIR project description suggests that the flares would operate rarely—only during facility maintenance or when the amount of LFG being produced is greater than what can be used to generate electricity, which the DEIR states would be an "unlikely event." Based on updated flow rates provided by the Sanitation District, it appears that the current amount of LFG produced is greater than the Project electricity-generating equipment can process. Also, the DEIR states that the methane content of the LFG is too low to assure continuous and complete combustion in the engines, meaning that augmentation with natural gas will be needed for proper operation of the power-generating equipment. But the DEIR doesn't explain whether the use of some natural gas to power the engines means that even less LFG than contemplated will be used in the engines, leading to even more need for continued use of flares.

L151-6 Also, the brief description of a rejected project alternative reducing the number of internal combustion engines (ICEs) from four to three explains that over time, the LFG available would decrease over time, and as a result, the engines would operate at reduced load factors and then eventually be decommissioned. This would also be the case for the project as proposed, yet the project description fails to provide information explaining the decrease in LFG availability over time, including time frames and amounts of the decrease, or the resulting effect on the decreasing amount of energy that would be generated from this project.

Project Objective

L151-7 The DEIR contains internally inconsistent descriptions of the project objective. As stated in the Project Description section, the single objective identified is "Safely capture all the LFG generated by the SCLF as required by regulatory standards and use the captured LFG generated by the SCLF for beneficial purposes such as combusting the LFG to generate power" (p. 2.4). This is somewhat different from the objective identified in the Introduction section, which states that "the Project objective is to beneficially use the methane-rich landfill gas (LFG) generated by SCLF as fuel to generate 100 percent renewable electrical energy on-site" (p. 1.1).

L151-8 GEC and Sierra Club believe that the primary project objective should be to minimize the environmental impacts of the LFG, and this should be a priority over using the LFG for "beneficial purposes." Moreover, we question the DEIR's assumption that burning the LFG would be "beneficial," as it would increase air pollution over the current treatment of the gas (flaring). We also question why it would matter to Glendale Water and Power that the Project be used to generate energy on-site. And the DEIR fails to detail what it means by "100 percent renewable" energy, as biogas is not a zero-carbon resource.

The lack of detail and consistency leaves decision makers and the community wondering about how these considerations play into the Project's motivations and goals.

Air Quality

L151-9 The DEIR has a number of gaps with respect to air quality impacts and the Project's compliance with state, regional, and local regulations.

L151-9 As proposed, the current Project would increase VOC, NOx, and CO emissions beyond significant thresholds and only marginally reduce PM2.5 and PM10 emissions by 4 lbs/day (see p. 4.63). This is concerning and unreasonable given that NOx and CO emissions are precursor pollutants for ozone in an area that already exceeds regulatory thresholds. The DEIR states that the Project can comply with significance thresholds through Priority Reserve Credit offsets, since the Project is "considered to be an essential public service." There are viable alternatives, such as installing new flares, that would reduce these emissions, and when alternatives exist that could avoid those emissions, the project can't be an essential service. Also, GEC and Sierra Club believe the City should utilize the best available technology to reduce harmful impacts to its citizens and its environment, rather than using offsets. We also note that flares, like the project itself, may emit other harmful air pollutants, and the DEIR's disclosure of information about emissions including toxic air contaminants is insufficient to allow complete understanding of these potential impacts from flaring LFG, whether as part of the project or an alternative.

L151-10 The City should prioritize installing new flares regardless of any outcome in this DEIR, as it will reduce NOx and VOC emissions (see 5.7), and ultimately minimize the environmental impact of the LFG. In addition, the level of GHG emissions from the new flares should be used as the baseline emissions of this Project, rather than the level of GHG emissions from the existing flare system. The DEIR acknowledges that the existing flare system doesn't comply with current regulations, and it is not appropriate to use a baseline contrary to what is currently allowed.

L151-11 Additionally, the DEIR states that portable generators that would combust diesel would be primarily used to power construction and support equipment. The DEIR lacks information and analysis of local air quality impacts, and ongoing cumulative impacts of wildfires and other polluting sources, associated with burning diesel for this project. There are viable alternatives to diesel, and the City should consider the best available technology that would avoid emissions and toxic air pollutants associated with the powering of construction equipment.

L151-12 The DEIR explains that the Project will involve a combustion exhaust gas cleanup system so that exhaust gases from the combustion process will comply with SCAQMD regulations. Regulatory compliance is necessary in its own right, but the DEIR does not spell out the underlying reasons for these regulations: the environmental and health effects of air contaminants in exhaust from the Project. Because of the importance of minimizing these effects, Glendale Water and Power should consider the feasibility and the benefits to the environment and public health from cleaning Project exhaust gas beyond the level needed to comply with regulations. But the DEIR makes no mention of these issues. Regulatory compliance is a minimum standard. When considering the health of the community and the environment, it's incumbent on the City of Glendale and its municipal utility to disclose and evaluate possible ways to achieve lower levels of pollution in exhaust from the Project.

Project Alternatives

L151-13 The DEIR originated out of a desire by the community and the Planning Commission to have a full opportunity to consider alternatives to the proposed biogas project. The gap between what the community asked for and what this DEIR has provided is glaring. The alternatives section appears focused on delivering the minimum level of analysis required by CEQA.

As the DEIR acknowledges, its alternatives section "analyzes project alternatives required for an EIR under the CEQA Guidelines" (p. 5.2). The DEIR states that under the CEQA Guidelines, an "alternatives analysis need not be presented in the same level of detail" as the analysis of the project itself, and an EIR need only provide enough information to "allow for meaningful evaluation, analysis, and comparison with the proposed Project" (p. 5.3).

The fact is that the alternatives analysis in many EIRs is focused on using a discussion of alternatives as an analytical tool to help decision makers understand the project and weigh its impacts and benefits through a comparative lens. In other words, an EIR's alternatives analysis is project-centric, rather than an equal presentation of various alternative ways of addressing needs and objectives.

L151-13

This DEIR devotes only 10 pages to presenting the four selected project alternatives, with each alternative's description running about a page or less. Even if this were sufficient to comply with CEQA, it's far from satisfying given that the driving impetus for the EIR was the desire to understand the pros and cons of different alternatives for dealing with the Scholl LFG, beyond the proposed power-generation project. The lack of responsiveness to the community's request is disappointing.

To meet the requirements of CEQA, however, an alternatives analysis has to be more than a conclusory discussion, and it has to have enough detail to allow readers to understand the relative environmental impacts of the alternatives and the project, and the rationale for concluding that that the recommended project is superior to the alternatives. The analysis should provide sufficient detail so the public and decision makers can evaluate the accuracy of a claim that an alternative is infeasible. The DEIR fails to meet these standards. Its analysis of alternatives includes many conclusory, unsupported reasons why various alternatives are rejected. The analysis leaves unanswered several questions and raises a number of concerns, including the following.

L151-14

If the project objectives had prioritized minimizing environmental and public health harms from use, treatment, or disposal of the LFG, what other potential environmentally superior alternatives might have been identified, analyzed, and presented for decision makers and the public to consider in place of the biogas generation project?

L151-15

The DEIR's analysis of alternatives leaves out important information that would allow the public and decision makers to understand the viability and the relative merits and drawbacks of the alternatives and the project. The analysis provides insufficient information on the air quality impacts from the project's reciprocating internal combustion engines (RICEs), and does not adequately compare the relative air quality impacts of the alternatives.

L151-16

The rejected alternative using fuel cells to generate electricity without combustion is described as having lower air quality impacts compared with the project. This appears to be an attractive alternative, and the explanation for why it was rejected is insufficient and raises questions: First, how much would this alternative reduce air quality impacts over the proposed project? Second, how much more would this alternative cost than the proposed project? Third, why is the fact that

a fuel cell project would involve packaging numerous cells considered a drawback? This information would help the public and decision makers evaluate the positives and negatives of this alternative. It would also be helpful to understand whether this alternative would require cleaning the LFG to a greater extent than would be required for the alternatives selected for analysis. Additionally, the DEIR assumes that all the fuel cells would need to be located at SCLF, when a better approach might be to place the fuel cells at distributed locations within the city. We request additional information be provided about this alternative in a recirculated DEIR before the project is submitted for approval.

L151-16

The discussion of Alternative 1 explains that current SCAQMD regulations require landfills that "do not convert 80 percent or more of LFG to beneficial use" to install flares that emit NOx and VOC compounds at lower rates. This means that the current flares at SCLF emit higher levels of harmful pollutants than necessary and currently available technology exists that could reduce those emissions. Yet that fact is barely mentioned in the DEIR. And the proposed project would emit even higher levels of some pollutants than the current flares. Alternative 1 states: "Operation phase air emissions of Alternative 1 would be less than those of the proposed Project because the flares emit lower concentrations of air pollutants than the RICEs associated with the proposed Project."

L151-17

It appears that GWP intends to continue using these existing flares in all circumstances except the "no project" alternative, despite their release of unnecessary levels of air pollutants. Many important questions arise, and are unanswered in the DEIR: How much would installing improved flares at SCLF reduce these ozone-forming pollutants? If the project doesn't go forward, when would GWP be obligated to install the new flares? If the project continues to move forward, but the deadline for submitting an application under the SCAQMD rule is reached before the proposed project is implemented, is GWP required to submit the application and begin the process of moving forward with replacing the flares? If GWP were to immediately pursue installation of new flares, how long would it take for them to be operational? What costs could be involved to install the flares, and what costs would be avoided through improved health outcomes? Could new flares be installed for backup purposes regardless of which project or alternative moves forward, how many flares would be needed in that case, and what considerations would weigh against doing that, given the reduced impacts for residents of Glendale, nearby areas, and the basin from emissions of these air pollutants?

The DEIR's discussion of Alternative 1 includes a section that purports to discuss potential environmental impacts greater than those of the proposed project. The only greater impacts identified are indirect GHG and energy impacts, but the DEIR's discussion on this point is conclusory and speculative. This undermines the basis for rejecting Alternative 1.

In summing up Alternative 2, the DEIR states that this alternative "would be a significant, energy consuming, and expensive challenge because it would require more equipment and processing of the LFG compared to combusting it in RICEs." This statement is inadequate as analysis of the alternative. It doesn't establish what is meant by "significant," "energy consuming," or "expensive," because of a complete failure to quantify or explain any of those claims. The DEIR fails to provide a comparison that shows relative energy consumption or expense.

L151-18

L151-19 For Alternatives 2 and 3, the DEIR makes conclusory statements about the costs and energy consumption of the processing that each alternative would entail, but because of the lack of supporting information and analysis, it is impossible to discern the relative costs and energy consumption of these alternatives. Not only does the analysis fail to allow meaningful comparison of each alternative with the project, but it impedes meaningful comparison between the alternatives.

Alternative 4 is described as relocating the proposed LFG power-generating plant to the Grayson Power Plant "or other City owned location within the City." Beyond that brief mention, no further disclosure or analysis is made of any other potential location besides Grayson. This is key information because it is fundamental to the viability and soundness of an alternative involving relocating the RICE plant.

L151-20 Like the analysis of the other alternatives, the DEIR provides incomplete and unsupported statements about Alternative 4. For example, the DEIR states that in this alternative, new electrical generating equipment would need to be installed to combust the LFG at Grayson "because the existing electrical generation equipment at Grayson Power Plant is either not designed to combust LFG or can no longer combust LFG as a result of SCAQMD regulations" (p. 5.14). The DEIR doesn't make clear whether this refers to the equipment that is physically located at Grayson at the present time but proposed to be decommissioned soon, or to the existing Grayson Unit 9, which will remain, or if it refers to the ICE equipment that is proposed as part of the currently planned changes to Grayson. Without this information, the public and decision makers can't understand the DEIR's analysis of this alternative. Precisely what equipment is not designed to combust LFG? Precisely what equipment cannot combust LFG at Grayson because of SCAQMD regulations?

The discussion of Alternative 4 doesn't explain the extent to which this alternative would increase impacts to air quality, energy, and greenhouse gases over the project. In particular, it's unclear if using the LFG pipeline between SCLF and Grayson would only minimally increase indirect GHG emissions, or if that would be a substantial increase, and the DEIR does not adequately discuss other potential impacts of using the pipeline.

The DEIR states that under Alternative 4, air pollutant emissions and noise impacts "would occur in closer proximity to sensitive and residential receptors" but gives very little information about these receptors and their actual distance from Grayson. Also, the DEIR lacks any information about how Alternative 4 might contribute to cumulative air quality impacts. All of this is crucial information because the Grayson vicinity is already heavily burdened by air pollution, including from existing operations of the power plant. GEC and Sierra Club oppose any new infrastructure at Grayson that could add to those burdens. For that reason, and because Alternative 4 has the highest environmental impacts of all alternatives, GEC and Sierra Club are opposed to it.

L151-21 A fair and reasonable selection and analysis of alternatives was impeded by not considering any changes to the LFG collection method. Alternatives should not be limited to what is feasible and cost effective with the biogas as it currently exists, because it is possible to change the

composition of the LFG by changing methods of collection. To investigate this possibility, the City should engage an expert in landfill gas collection techniques and technology, and consider how changes to LFG collection can play into a more robust exploration of alternatives to this project. This may open up other alternatives or change the efficacy and relative benefits of the alternatives already identified. For example, it is possible that some upfront investment may improve the economic feasibility of alternatives involving cleaning the LFG to natural gas standards for use by SoCalGas or to a level that allows its use in fuel cells. Fuel cells in particular could be a good long-term investment in Glendale's energy future.

L151-21

Scholl Canyon, Grayson, and Cumulative Impacts

This project should be considered and analyzed together with the rest of the proposed energy portfolio for Glendale's grid. This includes the proposals that are part of the resource portfolio currently in the development process based on the 2019 Integrated Resource Plan (IRP), but with recognition that the recommended portfolio in the 2019 IRP is outdated because elements of it have moved forward with different capacities than in the IRP, and the City Council has repeatedly shown that it would like GWP to work toward eliminating or reducing the need for new natural-gas generating units at the Grayson Power Plant.

L151-22

It's not appropriate to move forward with the Scholl biogas project on its own. This is demonstrated by the fact that the IRP assumed that LFG from Scholl Canyon would be part of Glendale's energy resource portfolio, despite the fact that this DEIR presents potential alternatives that may result in no local capacity from SCLF's biogas, and that the DEIR proposes a different capacity of power from LFG than is included in the IRP.

Treating the Scholl project and Grayson separately also weakens the DEIR's cumulative impacts analysis. The DEIR's analysis of cumulative air quality impacts is flawed, conclusory, and illogical. Noting without support that the Grayson repower project's environmental impacts are expected to be less than significant and that the Scholl biogas project's impacts were determined to be below significance thresholds, the DEIR conclusorily asserts that "given the distance between the two projects and level of impact from each project, it is reasonable to conclude that the combined impact of the two projects would also be less than significant." This is far from the level of analysis required under CEQA, which directs agencies to "identify facts and analysis" supporting a conclusion that cumulative impacts would be less than significant.

The distance between the projects is 5 miles. The DEIR acknowledges that a cumulative air quality impact may affect an entire air basin, so there's no basis for concluding that a distance of 5 miles would mean cumulative impacts are less than considerable.

And it's illogical to conclude that the combined impact would be less than significant because each project's impact is expected to be less than significant. If a threshold is 6 units, and Project A will produce 2 units and Project B will produce 5 units, the cumulative impact is significant, and Project A's impact is cumulatively considerable for that threshold. The DEIR cannot rely on this illogical statement to support a conclusion that the biogas project won't have cumulatively considerable impacts.

Conclusion

These comments reflect some concerns we've noted with the information disclosure and analysis in the DEIR. We know that other members of the public are submitting comments that address many other concerns, and GEC and Sierra Club join with other engaged members of the pubic in asking for the DEIR's deficiencies to be addressed, and a revised DEIR to be recirculated for
L151-23 public review before a Final EIR is issued and submitted to the decision makers for certification.

We request that the City release the Final EIR for public review at least 45 days before it is presented to the Planning Commission or any other commission or governmental body, to allow a full opportunity for public participation in this decision that is crucial to our community. We also ask that city staff, members of the Glendale Planning Commission, and City Council carefully consider all the issues we've raised here before evaluating a final EIR and making a decision. The City should commission a more thorough and searching alternatives study that addresses the concerns raised above.

Glendale must prioritize minimizing environmental impacts from the landfill gas at Scholl Canyon. As set out at the beginning of this letter, GEC and Sierra Club believe Glendale should identify and implement practices for handling the LFG that will minimize to the greatest extent possible its harmful environmental and climate impacts.

GEC and Sierra Club are most interested in the potential of Alternative 2 or the rejected fuel-cell alternative to achieve this goal compared to the other alternatives presented, and asks for additional information, including relative costs, as outlined above.

Glendale Water and Power should immediately install new, more efficient, flares that reduce GHG emissions no matter which alternative is selected.

Finally, GEC and Sierra Club are opposed to any alternative that shifts the environmental impact burden from Scholl Canyon to Grayson and urges a solution that works for the entire city of Glendale and its neighbors.

Sincerely,

Glendale Environmental Coalition Steering Committee

Monica Campagna	Kathy Kottaras	Jane Potelle
David Eisenberg	Nicholas Martins	Paul Rabinov
Elise Kalfayan	Jennifer Pinkerton	Kate Unger

Luis Amezcua, Sierra Club

L152

From: Mark Rothenberg
To: Krause, Erik
Subject: Proposed Biogas Project at the Glenoaks Canyon Landfill
Date: Thursday, October 01, 2020 4:34:14 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Dear Mr. Krause,

Please consider the following comments that I have as a member of the Glenoaks Canyon Homeowners Association regarding the Biogas Project proposed for the Scholl Canyon Landfill:

L152-1 *First, I have long expressed an interest in knowing what effect the non-compliant design of the current landfill is having on the health of canyon residents living close to it, as I do, as opposed to those living further away from it. I don't know if it's possible, but some sort of medical evaluation or survey that identifies the incidence of cancer and/or other possible landfill related illnesses charted as a function from their distance from the landfill could help identify the effect the landfill is currently having on nearby residents as well as potential long term effects related to the Biogas project.*

L152-2 *Also, as you may or may not know, there was **a brush fire at lower Scholl Canyon Park last Saturday night (9/26/20)** that could have developed into a catastrophic event had the fire department not responded so quickly. It was reported that the fire was started by some individuals lighting fireworks at the park. In light of the recent proximity of the Bobcat fire (still not fully contained) to our canyon and the landfill, it is not hard to imagine what could have transpired had the Bobcat Fire (or any other fire for that matter) been able to reached the Landfill, a development, by design, with inherent, long term reserves of flammable Methane gas. Considering the increasing likelihood of brush fires throughout the West, and more specifically in our state and canyon, a brush fire at or near the Landfill is becoming increasingly inevitable – especially since the City of Glendale does such an extremely poor job in clearing the brush from the area around the landfill. To confirm this, one simply needs to drive up Glenoaks Boulevard to the city's Golf Course atop Scholl Canyon. Flammable brush is everywhere, unabated, patiently waiting for someone to toss a lit cigarette out a car window - destroying our neighborhood. Since the City is clearly incapable of clearing the brush from around the Landfill, the residents of our canyon have no confidence in the City's ability to safely manage, construct, and operate the Biogas Project.*

L152-3 *Considering the landfill's underlying methane fuel source, it would not surprise me to learn that a significant brush fire at the landfill might not be able to be contained or extinguished in any real practical sense. The firestorms we have seen regionally and in other parts of the country would pale in comparison to a fire consuming the landfill and the surrounding neighborhoods. And putting out a fire with conventional methods could further contaminate our neighborhood, local ground water, etc., making rebuilding efforts problematic to say the least.*

L152-4 *It makes no sense whatsoever for the City to put any kind of industrial use on this property for short sighted financial gain considering the enormous regional health and fire risks imposed by such an undertaking. In my opinion, the lack of adequate due diligence on the City's part in actually*

L152-4 *preparing a comprehensive DEIR for this Project, clearly demonstrates the City's (and its consultant's) incompetence in evaluating the risks, not to mention their ability to undertake the construction and/or safe operation of the facility as currently contemplated in the middle of a highly populated residential area.*

L152-5 *I sincerely hope that you consider and address my comments. Any rational person would easily be able to identify the risks and conclude that the risks simply don't justify the potential rewards. I sincerely hope that the idea of constructing a Biogas Project in the midst of heavily populated fire zone be rendered forever moot and that the Landfill be converted back to recreational use as was originally promised to the residents of the City of Glendale.*

L152-6 *Zoning Laws were developed to specifically protect a city's residents from such a development from occurring.*

Thank you for your consideration in this regard.

Mark Alan Rothenberg, AIA
Glenoaks Canyon Resident

mark alan rothenberg, aia
2808 Glenoaks Canyon Drive
Glendale, California 91206
M: 213.880.7482
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L153

From: Nicole Saint
To: Krause, Erik
Subject: Public Comment about Biogas project at Scholl Landfill
Date: Thursday, October 01, 2020 12:00:01 AM

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Dear Mr Krause,

L153-1 I have never submitted a public comment about a City project before today, but I am writing you to express my deep concern over the proposed construction of a Biogas project at Scholl Landfill.

As five-year Glendale residents and one Glenoaks Canyon residents, my husband and I have the following concerns:

L153-2 1 - I am five months pregnant with our first child and we are very concerned about the increased risk of cancer, asthma and other health issues caused by poor air quality/pollution as a result of this proposed Biogas project. Married to a cancer survivor who suffers from asthma, I will be extremely upset if our City does not prioritize the health of its residents. The stakes are too high. Our air quality has already decreased due to the current flaring of the landfill gas at Scholl.

L153-3 2 - The proposed project site is way too close to residents, various elementary schools and the Verdugo Hills Fault. Moving forward with this project feels incredibly negligent.

L153-4 3 - We are in a very high fire zone. Multiple fires have been reported this summer, including one inside the landfill. As wildfires grow more frequent and aggressive in our state, the thought of bringing an added and unnecessary hazard into the neighborhood is devastating. We can't understand how the City feels comfortable bringing a plant that will process more methane, a highly explosive gas, to produce electricity in this already very high fire zone? This Biogas project will increase the fire risk in an already very high fire hazard zone, surrounded on all sides by residential areas. Knowing this fact and still moving forward with this project will be an irresponsible action, endangering the lives of all those living, working and going to school in the surrounding areas.

L153-5 4 - The landfill is unlined and leachate is already contaminating the LA River. How will this project prevent further contamination of soil and ground water?

L153-6 We have really enjoyed living in Glendale (and we hope to continue investing in this community for years to come), but this proposed project is deeply concerning. We beg you not move forward with this project and ask you to make it a priority to look into cleaning the landfill gas to renewable natural gas at an alternate location. We moved to this community to create a safe home for our family and this project would have the opposite effect.

L153-7 We urge the City of Glendale to work towards closure of Scholl Landfill by 2028 and stop further industrialization plans. We want terms for closure of the landfill by 2028 included in the upcoming Scholl Canyon Landill Joint Powers renewal Agreement.

Thank you,
Nicole and Brian McGaffey

2638 E Glenoaks Blvd
Glendale, CA 91206
323-313-3040

L154

From: Ray C.
To: Krause, Erik
Subject: Scholl Canyon Bio Gas Project
Date: Thursday, October 01, 2020 8:29:37 PM

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To Whom It May Concern

L154-1 I wanted to voice my strong opposition to the planned Biogas Project in Scholl Canyon. As a resident of Eagle Rock living across from the Eagle Rock Recreation Center, I already have to deal with weekly lineups of trucks along Figueroa idling on the street to get the landfill. I cannot accept the possibility that there will be more truck traffic, contributing to increasing noise and air pollution as well as the unsightly nature of just having industrial trucks on a street so close to my beautiful park.

L154-2 Furthermore, how selfish is it to create a methane processing center in the backyard of Eagle Rock and not have it benefit ANY of the Eagle Rock residents? Glendale can process their own methane. There's zero guarantee that this will not contribute to additional air pollution in Eagle Rock, and since I paid nearly 1million for my house, I find it appalling that Glendale would presume we would just bend over and let it happen.

Raymond Cho

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L155

From:	Greg Merideth
To:	Krause, Erik
Cc:	Hilda Solis; Waqas Raman; Sharon Tso; Avak Keotahian; kevin@kevindeleon.com; Sarah Flaherty; Jose Hernandez; tim.mcwilliams@lacity.org; paul.cobian@lacity.org
Subject:	Scholl Canyon DEIR Comments
Date:	Thursday, October 01, 2020 9:26:34 AM
Attachments:	TERA Scholl Canyon Comments 20200930.pdf

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Mr. Krause -

L155-1 Attached, please find the comments from The Eagle Rock Association (TERA) regarding the draft environmental impact report (DEIR). TERA believes that the DEIR inadequately addresses many safety and environmental issues. And, TERA would like to again voice its opposition to the continued operation of the Scholl Canyon landfill.

Greg Merideth
President
The Eagle Rock Association (TERA)

TERA

THE EAGLE ROCK ASSOCIATION

SINCE 1988

September 30, 2020

Mr. Erik, Krause, Deputy Director, Community Development
City of Glendale, Community Development Department
633 E. Broadway, Room 103
Glendale, CA 91206

On behalf of The Eagle Rock Association (TERA) – an all-volunteer organization dedicated to improving the quality of life in Eagle Rock – I write to provide comments and express our organization's concern about the draft environmental impact report (DEIR) released by Glendale on July 2, 2020. We are concerned about not only the proposed project's implications for the safety and environmental health of our community, but also the surrounding communities of Glendale, South Pasadena and West Pasadena.

L155-2

The DEIR associated with Glendale Water & Power's (GWP) effort to construct a 12-megawattt gas plant at the Scholl Canyon dump, abutting our neighborhood and accessed solely via City of Los Angeles streets, is concerning in several ways to not only our board of directors but to the more than 500 household members we represent as well as the merchants, businesses and other residents and stakeholders who support our efforts to protect and improve the quality of life in and around our neighborhood.

First, the DEIR overlooks the significant fire danger to the Scholl Canyon dump and surrounding neighborhoods. We argue that proposing to build a gas plant in a known High Fire Hazard Severity Zone and frequent burn area makes no sense, especially in the context of increasingly severe and extended fire seasons throughout our state. We know from media coverage that since 2009, at least 8 significant and hazardous fires have occurred in areas immediately surrounding the dump. The prospect of — and legitimate concern about repeated fires and whether and if they can be adequately mitigated — needs to be more fully studied and detailed. The DEIR neglects to study projected increases in fire severity within the project vicinity as caused by climate change, and the impact of this proposal in that context. As we know from the current experience with the Bobcat Fire, the impact of smoke to our air quality and respiratory health of our local residents, particularly the frail and elderly, are significant and yet have not been considered fully in the DEIR.

L155-3

Second, the DEIR overlooks Alternative 2. Alternative 2 cleans up the methane captured at Scholl Canyon to standards of natural gas suitable for use, some or all of which can be done at

L155-4

L155-4 Grayson Power Plant. The DEIR needs to more fully explore the viability of Alternative 2 before moving forward with plans to intensify capital investments and infrastructure that may result in unintended environmental health hazards for which adequate mitigation measures have not yet been identified.

L155-5 Third, the DEIR's review of air quality impacts are misleading and insufficient for providing information to the public about the result to air quality within neighboring residential neighborhoods. The application of SCAQMD Priority Reserve credits obscures the fact that the DEIR itself shows the proposed project would cause Nitrous Oxide, Carbon Monoxide, and Volatile Organic Compounds to exceed significance thresholds. Considering the impact to resident health, it is unacceptable that the DEIR neglects to study all air quality impacts in direct comparison a baseline of Scholl Canyon dump closure, and with use of cumulative emissions that include contextual impacts to air quality.

L155-6 Finally, TERA is on record opposing the continued operation of Scholl Canyon beyond the time it was originally intended to be in operation. The site continues to spew unhealthy air pollution that impacts local residents, both young and old, as well as those who are healthy and those with pre-existing conditions alike. We urge Glendale to reconsider this fundamentally unsound, unwise, and unhealthy proposal – especially in light of the current COVID-19 pandemic, increasing regional fire danger, and confounding implications from unhealthy air and severe respiratory infection – and move instead towards a permanent phase-out of the Scholl Canyon dump.

Thank you for your consideration.

Sincerely,

Greg Merideth
President

Cc: Jose Hernandez, Council District 14
Sharon Tso, Chief Legislative Analyst
Avak Keotahian, Assistant Chief Legislative Analyst
Councilmember-elect Kevin de León
Sarah Flaherty, office of Councilmember-elect Kevin de León
County Supervisor Hilda Solis
Waqas Rehman, Office of County Supervisor Hilda Solis
Tim McWilliams, Los Angelese. City Attorney's Office
Paul Cobian, Los Angeles Bureau of Sanitation

L156

From:	Walt Kasha
To:	Krause, Erik
Cc:	Agajanian, Vrej; Devine, Paula; Kassakhian, Ardashes; Brotman, Daniel; Najarian, Ara
Subject:	Re: Opposition to Scholl Canyon Biogas Plant DEIR -- NO HILLSIDE POWER PLANT IN GLENDALE!
Date:	Monday, October 05, 2020 8:34:08 PM

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

TO: Mr. Eric Krause
ekrause@glendaleca.gov

CC: Glendale City Council Members
vagajanian@glendaleca.gov;
pdevine@glendaleca.gov;
AKassakhian@Glendaleca.gov;
dbrotman@glendaleca.gov;
anajarian@glendaleca.gov

Re: Opposition to Scholl Canyon Biogas Plant DEIR -- NO HILLSIDE POWER PLANT IN GLENDALE!

L156-1 My name is Walt Kasha. I have been a resident of Glenoaks Canyon for 10 years, and my wife's family has lived in Glenoaks Canyon for over 45 years. One of my favorite aspects of the Canyon is being able to exercise outdoors regularly close to nature and in a safe and healthy environment.

L156-2 **Background**: Glendale Water & Power (GWP) wants to build a 12-megawatt power plant on the Scholl Canyon Landfill to turn landfill gas into electricity. The draft Environmental Impact Report for the project (DEIR) claims that the proposed "Project would not result in any significant and unavoidable environmental impacts." GWP proposes only minor mitigation measures in the areas of biological resources and wildfire. For decades the landfill gas had been sent via a pipeline to the Grayson Power Plant and turned into electricity there. In April 2016, the City of Glendale stopped this process, claiming that pollution near Grayson exceeded acceptable levels due to the old Grayson equipment. Since that time, the landfill gas has been burned, or "flared," at Scholl. There are many serious and dangerous impacts to the surrounding neighborhoods.

The Landfill Needs to Shut Down! The City must look at the proposed projects holistically. For example, ***the landfill was legally required to be closed in 1987 per the Joint Power Agreement but it has stayed open***. A few years ago, the City proposed to expand and/or extend the landfill and those proposals

are hanging out there unresolved. There is excess capacity at the landfill that Glendale ***sells to other cities for a profit***. The Scholl Canyon residents don't feel this is fair since the environmental burdens are suffered most by them. The residents want to avoid putting a project at Scholl that would enable the landfill to continue in perpetuity since it is already long past its original expiration date.

General Concerns:

* GWP must evaluate what fire mitigation is needed *now*, when the landfill gas is being flared 100% of the time.

L156-2

* The City of Glendale needs to look immediately into new flares to improve air quality. Flares will be used as backup for the proposed project and for all alternatives.

* The Scholl Canyon Landfill area is surrounded by residential and recreation areas and should not be further industrialized. We are particularly concerned about the aesthetics, air quality, biological impacts, water contamination, noise, and fire danger of this proposed project in an earthquake-prone area.

* GWP should perform an impartial and quantitative discussion of all of the alternatives. More details are needed in particular on Alternative 2, which contemplates cleaning up the gas to renewable natural gas (RNG) standards and delivering it to the gas company. Alternatively, the cleaned up RNG could generate electricity at Grayson or be used in fuel cells or other options. At least some of the gas cleanup could occur at Grayson.

* A single combined EIR for Grayson and Scholl, discussing energy needs, renewable portfolio, and landfill gas utilization, needs to be done. Grayson and Scholl are completely connected, both physically, by the landfill gas pipeline, and also by the fact that both sites are parts of Glendale's overall electricity production and renewable portfolio. At least two of the alternatives rely on using Grayson facilities.

* GWP needs to assure the public that nothing that is done with the landfill gas will affect the current closure criteria for the landfill. It should not be rezoned as industrial, and a Conditional Use Permit (CUP) should not be granted.

* GWP needs to show the impact of the proposed project on the site after the landfill closes, since the proposed project is likely to continue to function 10 or more years past the closure date of the landfill, because landfill gas will continue to be emitted.

**** Property values will plummet*** in Glenoaks Canyon. Like Porter Ranch, here a public service is located in a very close proximity to a huge residential area. Methane gas can leak from a garbage dump causing serious potential hazards and resulting in huge liability to the City if something goes terribly wrong. This would be personally devastating for us.

Major Issues with the DEIR:

Air Quality: Pollution from the project will exceed the South Coast Air Quality Management District's (SCQAMD) thresholds for four contaminants, but the DEIR does not discuss either mitigation or using the best available control technology (BACT). Instead, the DEIR assumes that GWP will get priority reserve credits to eliminate the pollutants *on paper*. Measurements of the pollutants are made from monitors that are not near the landfill. The DEIR also ignores carcinogenic pollutants such as dioxins and furans.

Geology and Soils: The project will be located atop a mountain that sits near a potential 6.7 earthquake fault. Seismic waves on a mountain can be amplified 4 or 5 times those of field waves, and the report both gives insufficient mitigation measures for threats to power equipment, buildings, tanks, and pipelines and fails to present emergency back-up systems to mitigate damage from earthquakes or fire.

L156-2

Wildfire: Wildfire is a huge risk to Glenoaks and Chevy Chase Canyons, Linda Vista, and Eagle Rock due to its location in a designated very high fire zone. These neighborhoods have mostly narrow, single-access roads. The wildfire plan minimizes the danger and carelessly assumes that an on-site water tank and a fire department more than 5 miles away are sufficient.

- Recently, ***many Glenoaks Canyon residents have received fire insurance cancellation notices because of the extreme fire risk*** that already exists due to climate change and other factors. ***Putting a power plant on the hillside will make matters dramatically worse and create a catastrophic risk to life and property***.

- ***Have we not learned the hard lessons from largest gas leak in American history at Aliso Canyon?*** The Aliso Canyon massive leak caused thousands of local residents to have headaches, nausea, skin rashes, and severe nosebleeds. Over 1,000 residents had to be relocated resulting in over 1,000 lawsuits plus criminal charges. The Aliso Canyon gas leak cost Southern California Gas Co. over ***$1 billion in costs***. Here, that enormous liability would be borne by the City of Glendale and its residents since the power plant would be owned by the City and not a private company. These gas facilities should never be put in the middle

of a residential area *especially* in such a high fire risk zone like Glenoaks Canyon.

Project Details: Many significant details are missing, including views of the project as proposed and as it will look when the landfill closes. How will the project impact the intended future recreation use of the site? What are the current landfill gas constituents and gas flow rate? Why were these engines chosen instead of other alternatives such as turbines?

L156-2

Aesthetics: The 60,000-gallon water tank and the 40-foot tall engines will be visible from surrounding residential neighborhoods and will likely be visible from trails when the area reverts to a recreation area.

Biological Resources: The potential biological impact does not address key species. In addition, these hills serve as a wildlife corridor that could be disrupted by the project.

Energy: Although the project will utilize the energy that is currently being flared, there may be alternatives that can use the gas with less impact on the environment.

Greenhouse Gas (GHG) Emissions: The GHG numbers for the proposed project in Section 4.6 are inconsistent with the numbers in Appendix F. The numbers from Appendix F and the baseline flare numbers from Section 4.6 show that the GHG emissions may increase more than the significance threshold of 10,000 metric tons of carbon dioxide equivalent per year. It is altogether unclear where the proposed project numbers in Section 4.6 come from.

Hazards and Hazardous Materials: Hazards need to include the effect of earthquakes and fire on the hazards listed, such as the lube oil and waste oil tanks, and the natural gas line.

Hydrology and Water Quality: The landfill is unlined; therefore, the proposed project must ensure that oil and other contaminants are contained to protect the groundwater. In addition, more groundwater monitoring needs to be done to assure no release and migration of hazardous materials.

Land Use & Planning: The landfill and its closed sections operate under a Variance to the Special Recreation zoning use that applies to the entire area. Residential zones encircle the facility. These zoning designations reflect the long-held intent that the entire area would revert to recreational uses once the

landfill is closed. It will likely reach its fill limit within 10 years. The project requires a Conditional Use Permit, which would open the door to further industrialization. Residents in the surrounding areas strongly oppose this change.

Noise: The chosen engines put out sound in very low frequencies 24/7. The analysis chart only goes down to 31.5 Hz, while humans can hear down to 20 (and can feel below that). Coupled with the difficulty the terrain makes for analysis, this could be harmful to both humans and animals.

L156-2

Transportation: The report underestimates the project's impact on transportation by not including increased traffic during construction on Glenoaks Blvd. and by not addressing Colorado Blvd., especially near Figueroa, at all.

Utilities and Service Systems: This section needs a full discussion of the natural gas line and why it is not underground. *Also, how will this 12-megawatt facility interconnect to the electric grid*? This is a major missing piece.

Alternatives: GWP picked the proposed project without a detailed study of the alternatives and then backed into making them less attractive than the proposed project. An impartial and quantitative discussion of the alternatives is needed, particularly Alternative 2, which cleans up the gas to renewable natural gas (RNG) standards and injects it into the gas company's pipeline. Some vendors consider Alternative 2 an environmentally friendly and doable option, although it may require upgrading the landfill gas collection system. Distributing the gas cleaning processes between Scholl and Grayson should also be explored.

Conclusion: ***We request that the landfill be closed as soon as possible and in the meantime that it be used only for Glendale residents*** and specifically Glenoaks Canyon residents. By doing this, the City will delay having to look for an alternate site for Glendale's own trash disposal needs at unknown costs in the future. We want to put this off for future generations and avoid being in the same position we are now. ***Please stop letting other cities use the site for monetary compensation***. The environment and our health take precedence over any amount of money.

There are over 2,000 residents in the Canyon, and we all currently enjoy the physical beauty of the surrounding environment. Glenoaks Canyon is truly a special place. We really don't want it to change.

Thank you for your attention to this important matter.

Sincerely,

Walt Kasha
2418 Bywood Dr.
Glendale CA 91206

L157

Dear Mr. Krause,

The following are my comments about the proposed Biogas Plant to be built at the Scholl Canyon Landfill:

L157-1 1- It would be processing methane, a highly explosive gas to produce electricity in a very high fire zone.

L157-2 2- It would increase air pollution and increase cancer risk.

L157-3 3- It would be too close to residents in Glenoaks Canyon, half mile from the nearest house, including running 24 hours a day, 7 days a week, creating too much noise.

L157-4 4- It will be located just 1/2 mile from Verdugo Hills Fault.

L157-5 5- The environmental impact report says the Landfill will reach capacity in 2030. Why bring a plant here with just so few years left in the Landfill?? * This could be located at Grayson and the Landfill gas should be piped there.

L157-6 ALTERNATIVE 2

Cleaning Landfill gas to Renwable Natured Gas, would be a better choice for nearby residents since it would have a minimal air pollution & less health HAZARD

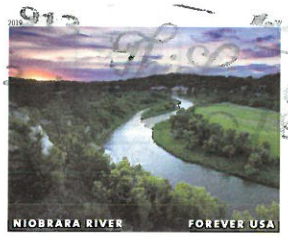
Thank you.

Sincerely,

Armen & Anahid Mnatsaganian

A. Mnatsaphi
2290 Hollister Ln.
Glendale, CA. 91206

12 SEP 2020 PM



Erik Krause
Deputy Director of Community Development, City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

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L158

BOARD OF SUPERVISORS
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HILDA L. SOLIS
CHAIR, BOARD OF SUPERVISORS
SUPERVISOR, FIRST DISTRICT

March 3, 2021

Erik Krause
Deputy Director, Community Development
City of Glendale, Community Development Department
633 E. Broadway, Rm. 103
Glendale, CA 91206

Dear Mr. Krause,

L158-1 As Los Angeles County Supervisor for the First District, I represent the residents of Eagle Rock and share the community's concerns about the City of Glendale's proposal to build a 12-megawatt gas plant atop of the Scholl Canyon Landfill. This proposal has dire public health and environmental implications to the surrounding area.

L158-2 In reviewing the Draft Environmental Impact Report for the proposed project, I, along with many in the community, noticed insufficient consideration to and analysis of the severe fire danger by building a gas plant in a known burn area. In fact, the DEIR indicated that while the probability of a wildfire would be low, "any fire that escapes control or spreads into the surrounding area could result in **a large amount of damage**, and **the risk of fire** as a result of unmitigated Project construction is therefore **considered potentially significant**."

L158-3 The County's own Department of Public Works submitted a letter to comment on the DEIR urging for a comprehensive analysis on emergency evacuation routes and response plan in case of a fire disaster event. The fact that the DEIR neglected to address what is clearly top of mind for residents in the surrounding areas is alarming.

L158-4 Additionally, the community has also raised unsettling questions of serious lapses in transparency involving the gas pipeline for processing landfill gas within the city's existing footprint of infrastructure. Those questions remain unanswered.

L158-5 The alternatives to the build-up of the landfill site and imposition of a new pipeline, with their exorbitant costs and undeniable risks, likewise remain under-analyzed.

L158-6 With these concerns in mind, I stand with the community and residents of Eagle Rock in opposition to the proposed project.

Should you have any questions, please feel free to contact my office at (213) 974-4111.

Sincerely,

Hilda L Solis

HILDA L. SOLIS
Supervisor, First District
Chair, Board of Supervisors