JOSE HUIZAR
COUNCILMEMBER, 14TH DISTRICT

November 20, 2017

Erik Krause, Deputy Director
Community Development Department, Planning Division Office
633 E. Broadway, Room 103
Glendale, CA 91206
via email at EKrause@glendaleca.gov

Dear Mr. Krause:

As representative of the City of Los Angeles Council District 14, which includes the community of Eagle Rock, I am submitting comments in response to the Draft Environmental Impact Report [DEIR] proposed by the Glendale Water and Power [GWP] for the Grayson Repowering Project [proposed project].

I am concerned that the analysis of the proposed project is improperly segregated from the related proposal for a landfill-gas power plant at Scholl Canyon. Consequently, the analysis fails to adequately consider related impacts, and in so doing increases negative impacts that could and should be avoided. I discuss this in greater detail in other sections of this letter.

I am also concerned about potential impacts to the LA River and a failure to properly consider the significance of the riparian setting of the site at which the Verdugo Wash joins with the LA River. I was an early and ardent supporter of Alternative 20 of the US Army Corps of Engineers' ARBOR study, which includes the confluence of the Verdugo Wash and the LA River among the priority areas for habitat restoration. This restoration plan and any impacts of runoff or other discharges into the River are important to the City of Los Angeles and to my district, which is downstream from the proposed project. If the proposed project in any way degrades or impedes future restoration of the confluence area as planned by the ARBOR study, negative impacts would be of significance beyond the site, including to investments the City is planning for downstream areas of the ARBOR study. Instead, the proposed project should more fully consider the anticipated restoration at the confluence and also be designed so as to facilitate that restoration work.

It is unsatisfactory that the DEIR recognizes "The Los Angeles River and Verdugo Wash located adjacent to the Project site provide potential habitat for fish and wildlife as well as a movement corridor" but then immediately discounts the significance of the site referencing that "development that occurs along the waterways and concrete channelization that lines on portions of the Los Angeles River [sic] limit the habitat quality and connectivity service of the system"

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[Section 2.4, p 2.12]. It should be evident that the project site is actually part of the degradation that the DEIR cites as a justification for not further analyzing biological impacts. The proposed project should instead be designed to improve site conditions and thereby mitigate the continuation of negative biological impacts to the area.

Furthermore, I am concerned that the proposed project commits Glendale to an over-reliance on fossil fuels at a time when our cities and our region are successfully shifting to cleaner, renewable power. A lower-megawatt alternative that incorporates landfill gas at the Grayson site should be considered.

In the City of Los Angeles, I have been a strong supporter of a transition to renewable energy, and, as such, I understand the relationship among intermittent sources like solar and wind, baseload power and "firming" resources that can be provided by natural gas. In the case for the proposed project, there appears to be conflict between GWP's desire to increase the gas capacity of its current facility and its existing ability to supply nearly half its electricity from renewable sources [City of Glendale, "Facts Versus Rumors" webpage, accessed 11/15/17, at http://www.glendaleca.gov/government/departments/management-services/communications-community-relations/rumor-page]. If GWP is already able to supply half its electricity demand with renewables, it should not require the proposed amount of gas-fueled baseload power.

Failure to Analyze Landfill Gas Results in Waste and Pollution

By shifting landfill gas to Scholl Canyon, GWP may actually be wasting renewable resources in order to maximize fossil fuels at the Grayson facility. At least one analysis indicates that using the more-efficient Grayson facility would provide 38% more power from landfill gas than if it is burned in the reciprocating engines proposed at Scholl Canyon [Comments of the Collaborative Eagle Rock Beautiful on the Biogas Renewable Generation Project Administrative Draft Initial Study/Mitigated Negative Declaration, 11/9/17, p 10].

Conversely, the proposed projects together would be less efficient and result in unnecessary pollution and fuel use. In fact, without enforceable mitigating conditions, the waste and pollution could be much greater.

The DEIR states, "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" [p 3.1].

It is an ill-advised proposal to remove a pipeline that delivers landfill gas to an existing power plant so it can be flared instead. Does the DEIR consider the possibility that the biogas project does not get built or does not perform reliably for the life of the Grayson power plant? By pretending that these are unrelated projects, the environmental risks and negative impacts are not properly analyzed or mitigated.

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For example, the DEIR openly excludes the impacts of landfill gas combustion: "by the time the Project is constructed, landfill gas will be retained and combusted at the Scholl Canyon Landfill. As a result, GHG emissions from the landfill gas combustion are not included in the baseline emissions inventory when determining the net GHG increase for the Grayson Repowering Project" [p 4.5.6]. In other words, DEIR is not capturing the GHG increases of landfill gas combustion, nor of the potential for even greater emissions, if the biogas project is not built or fails to perform.

Furthermore, the DEIR fails to address the potential impacts of landfill gas, which would be stranded when the lifespan of the proposed Scholl Canyon facility ends and the Grayson facility, as proposed, has ceased to accept landfill gas. The DEIR states the proposed Grayson repowering "would be designed for an expected operating life of 30 years. Reliability and availability projections are based on this operating life" [p 3.58]. However "The life of the [Scholl Canyon Biogas Generation] Project is anticipated to be 20 years" [Biogas Renewable Generation Project MND, p 1.11]. The 10-year gap in the operating lives of the two projects results in a potential negative impact of the proposed project's exclusion of landfill gas. This requires mitigation and is also evidence that the two projects should be considered together in a single environmental analysis.

Segregation of Grayson and Scholl Canyon Proposals Is Improper

The proposed project is enabled by the proposed Biogas Renewable Generation Project at Scholl Canyon Landfill, which is undergoing a separate environmental review, a Mitigated Negative Declaration [MND]. Segregation of the environmental reviews of the two projects is improper.

The relationship is clear. GWP intends to maximize fossil fuel capacity at the Grayson Plant, and by externalizing the impacts of landfill gas, the DEIR avoids having to account for and mitigate those impacts, even though the shifting of power production and the overall increased production of power would result in increased emissions and other impacts. When impacts are analyzed in isolation, they are considered below significance thresholds in the Scholl Canyon MND. I request to incorporate by reference my comment letter on the Scholl Canyon MND, 11/8/17.

If the proposed project were designed to be able to use landfill gas, it would better meet Project Objective #6 "... to minimize the need for major infrastructure improvements such as fuel supply, water, wastewater, recycled water and transmission facilities" [p 2.15]. By segregating consideration of the Scholl Canyon project, however, the DEIR is unable to make this and other comparative analyses.

Cumulative Impacts Are Not Adequately Addressed

The presentation of cumulative impacts is superficial and inadequate. While it identifies three Scholl Canyon-based proposals "that may result in similar impacts," it fails to acknowledge the direct relationship among them regarding the quantity of landfill gas likely to be produced and how it should be used. This deserves a substantive assessment.

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The DEIR states the Scholl Canyon Landfill Expansion Project "may result in similar impacts" and also claims the analysis is made "in connection with effects from past, current, and probable future projects." However, it fails to address the historic and ongoing negative impacts that the operation of the landfill has on the community of Eagle Rock. [p 4.11.2]

Instead, the proposed project would exacerbate the negative impacts with "an average of ten truckloads and a maximum of 20 truckloads of waste material… shipped from the Project site most days during demolition to be recycled or transported to the landfill" [p 3.47].

The cumulative analysis is inherently flawed because GWP improperly insists that related projects are independent, and in so doing simply spreads pollution over a wider area in order to ignore the total pollution volumes. The DEIR states, "The Biogas Renewable Generation Project, which consists of constructing a new power generation facility at Scholl Canyon Landfill, may be the closest project that can cause significant contribution to the ambient air quality and health risk. However, the project location is approximately six miles east of the Grayson power plant. Emissions from both projects are not expected to have cumulative impact toward ambient air quality standards and public health, given their distance from each other" [p 4.11.5].

In conclusion, I encourage GWP to find the DEIR for the proposed project inadequate in its current form and scope. The DEIR should be revised to incorporate the related Scholl Canyon Biogas Generation project. The DEIR for the proposed project must better address biological impacts related to the Verdugo Wash and LA River. Finally, I encourage GWP to reconsider what appears to be an over-commitment to fossil fuel generation in the repowering currently proposed.

I appreciate your consideration of these comments, and I welcome any opportunity to work together with GWP and the City of Glendale to resolve my concerns.

Sincerely,

JOSE HUIZAR
COUNCILMEMBER, DISTRICT 14
CITY OF LOS ANGELES

cc: Glendale Mayor Vartan Gharpetian and members of the City Council
GWP Commission President Manuel C. Camargo and members of the Commission
Stephen Zurn, Director, GWP
April M. Fitzpatrick, Assistant General Manager, GWP
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