



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.

The DEIR associated with Glendale Water & Power's (GWP) effort to construct a 12-megawatt 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.

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

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.

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.

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  
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Councilmember-elect Kevin de León  
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