



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.

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.

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.

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:

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

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:

- Refused to present what would be required to clean the gas for pipeline or other non-combustion of off-site uses
- Insisted without justification that its current pipeline and the Grayson site cannot be evaluated as alternatives
- Continued to neglect Eagle Rock by offering no mitigation to operations and further industrialization of the landfill.

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.

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.

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.

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.

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

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