

**TO: Community Development Department, Planning Division,  
City of Glendale**

**FROM: Gerry Rankin, Lifetime Resident of Glendale, Resident of Glenoaks Canyon for 76 years of my 81 years on Earth, Member of Glenoaks Canyon Board of Directors**

**Comment on Intent to Adopt a Mitigated Negative Declaration relating to  
“Biogas Renewable Generation Project”**

Notice of Intent to Adopt a Mitigated Negative Declaration with regard to a proposed “Biogas Renewable Generation Project” was placed on the City of Glendale’s website on August 30, 2017. It could be found under the project location of 7721 N. Figueroa St., Los Angeles, CA 90041, an address totally unfamiliar with Members of Glenoaks Canyon Board of Directors, who have been deeply concerned about the expansion of the Scholl Canyon Landfill since 2014. The notice states as follows: “The Proposed Mitigated Declaration and all documents referenced therein are available for review in the Community Development office, Room 103 of the Municipal Services Building, 633 East Broadway, Glendale, California 91206-4386 and on the Planning Division website: <http://glendaleca.gov/environmental>.” The notice also states that written comments may be submitted to the Community Development Department, Planning Division office, at the address listed above, by September 30, 2017. (The September date was changed to October 20, 2017, due to complaints that the notice was not received by the Glenoaks Canyon Homeowners Association and that finding it on the City website listed under an obscure address was next to impossible for City residents.)

On October 12, 2017, I attempted to access the above-described documents at the stated address and office. They were not available. In fact, no one who talked with me in that office seemed to have heard about these records. I was told to go to the Water & Power Building. There I located a manager-type electrical engineer on the Fourth Floor. He told me that the only way I could review the records on the Scholl Canyon and Grayson projects was by logging into a computer to a couple of websites he listed for me. There was no possibility for me to see paper records.

In response to my questions, the gentleman kindly provided a general description of the power station and its proposed mission. He said the project would consist of four separate generators, each of which would be incased in a box-like container forty feet long. They would be transported to the site separately and they could operate separately when installed. Presumably other such units could be added to or subtracted from the station, as needed. They were mobile. The four units operating as a set would be able to produce 10 to 12 megawatts of electricity per day compared with the approximate 250 megawatt capacity that a modernized Grayson Power Plant would be expected to produce. The basic

purpose of this Scholl Canyon plant would be to consume the methane gas constantly coming from the landfill. However, due to the corrosive nature of the impurities in the landfill gas, a cleansing process for the gas should occur before it would enter the four generators to produce electricity by combustion. Therefore, a gas-refining unit, such as the one already in place at the landfill, would be a part of the project. Also, a gas line owned by the City would be extended to assist in the purifying process and, if the conditions warranted, to increase the supply of gas injected into the generators.

When I asked about the status of a proposed anaerobic digester at the Scholl Canyon site, the gentleman told me he did not know anything about an anaerobic digester at the site. He indicated that a digester would not be needed. With the gas from the landfill and the extended gas line, there would be plenty available gas at the site to make the small power generating plant economically practical. When I heard him talk about the four generators the size of 40-foot containers, I visualized seeing them being pulled by heavy-duty tractor-trailers. With this relatively mobile equipment, I thought, if four could be moved and hooked up, why couldn't four more be brought in? That would make this project easy to build on whenever the City might decide to expand the operation. This is the kind of thing that makes many residents nervous. Why? Because so many pieces in the puzzle seem to indicate that the City's planning for Scholl Canyon points to a long-term goal to keep the Scholl Canyon Landfill open a very long time – into the Twenty-Second Century if possible.

Why is it that the City is so anxious to tear out the pipeline that moves the methane gas from Scholl Canyon to Grayson Power Plant? The City has provided no evidence to support comments that are intended to give the impression that the pipeline is defective and dangerous. Moreover, why is the City so anxious to stop all electricity production at Grayson for an extended period during the "repowering" process even though Grayson has an existing turbine that Water & Power says is in excellent condition and is quite capable of competing with other first-rank gas-fired turbines in the State? That leads us to think that the answer might be that if this turbine were to continue in use, the primary argument for building the proposed Scholl power station would collapse.

After failing to obtain records on either the proposed power station at Scholl Canyon or on the proposed repowering of the Grayson Power Plant, I went to the Main Glendale Public Library to learn whether the library had a copy of the records as stated in City messages issued on the internet. The librarians searched through their records, including the records they maintain in the library's basement, but they could find no trace of the records or any indication that the records had been received by the library.

The failure to make the paper records available, as the City had promised in writing, may not have been a problem for many people. However, it was a critical barrier for me. At 81 years of age, with a sore back that has required extensive therapy and was a factor in retiring at the age of 67 years, I have difficulty sitting in front of a computer screen for long periods of time. Nevertheless, I have

received copies from friends of some sections of the Mitigated Negative Declaration.

Three other major projects are tied to the small but expensive power plant at Scholl Canyon. They are: 1) expansion of the Scholl Canyon Landfill, 2) the anaerobic digestion project, and 3) perhaps most important of all, Grayson Power Plant. So let's take these three one at a time but in reverse order:

- 1) Grayson Power Plant: The first question that crossed my mind when I heard the City's proposal for Grayson was: Why would the City want to spend three, four, or five hundred million dollars to build a new gas-fired power plant when electricity is cheaper now on the electricity grid than we could have ever imagined three or four years ago, and especially why do that when gas-fired generation is losing to solar, wind, hydroelectric, and other ways of producing electricity? I can't imagine that the State of California will permit the proposed rebuilding of Grayson Power Plant. Their likely refusal to permit it would be for our own good. A new costly Grayson Plant would destroy Glendale's financial health and could send our City into bankruptcy. So we had best not do anything risky at Scholl Canyon until we get news from the State with regard to permitting the City's plans for Grayson. Once we learn the fate of Grayson, we shall be in a better position to decide what should be done about the proposed four-generator power plant at Scholl Canyon Landfill.
- 2) Anaerobic Digestion Project: The comments made to me by the official at Water and Power on October 12, denying knowledge of any role of an anaerobic digester at Scholl Canyon, surprised me because the City informed the Glenoaks Canyon Homeowners Association about an anaerobic digester component to the expansion of the Scholl Canyon Landfill in 2014 prior to mentioning anything about the small power plant and also because City staff has continued to present both projects as a complimentary set for improving the performance of the landfill site. I have learned that many residents of Glenoaks Canyon fear the anaerobic digester more than the proposed small power plant. Increased truck traffic to, at, and from the site, along with odors, and general messiness of the operation are the undesirable impacts often mentioned. Another is the cramped space at the site, which is at the entrance used by all vehicles hauling waste to the landfill. Likely excavation of a steep chaparral-covered hill on the east side of the site would be required to squeeze in both the power plant and an anaerobic digester together with the present operations already established there.
- 3) Expansion of Dumping at the Scholl Canyon Landfill: Dumping and burying waste at Scholl Canyon is now, and since its inception in 1960, has been the only activity related to waste disposal at the site. Thus, the straightforward solution to waste disposal in Glendale and the neighboring watershed has always been to increase the horizontal and vertical boundaries of this activity at the site. This is the solution applied a number

of times during the fifty-plus years the landfill has existed. The one major hurdle has been receiving a permit for the latest desired expansion. By 2004, the County and the City began to be seriously concerned that the generous permitted width and height in effect at that time would not be sufficient in twenty or twenty-five years to accommodate an increasing volume of waste that was being presented for disposal at the landfill. Since the permitted height of 1,525 feet above sea level was more critical than the horizontal boundaries due to a lack of useable horizontal space, the focus has been on increasing the permitted height. The City chose an addition of 180 feet, which would mean that the landfill would reach an elevation of 1,710 feet above sea level. However, the amount of waste for disposal has decreased substantially since 2004 for various reasons. Thus, the need to increase the height has not been as pressing as it was thirteen years ago. The existing permitted height of 1,525 feet now seems sufficient until at least the year 2030.

Nevertheless, the City, with the County's strong support and insistence, decided to proceed with plans to complete and release to the public in early 2014 the Draft Environmental Impact Report (DEIR) that had been in the works for several years. City Council must have been shocked by the avalanche of comments opposing the expansion of the landfill through increasing the permitted height to 1,710 feet above sea level, along with another recommendation to increase both the vertical and the horizontal dimensions. These opposing comments not only came from affected residents in the neighboring communities, they came from government agencies such as the Solid Waste Management Committee of Los Angeles County, the Environmental Programs Division of Los Angeles County, the Director of Planning and Community Development of Pasadena, and the Los Angeles City Board of Education. They pointed out numerous adverse impacts that they considered would occur, and have been occurring, by the ill-placed landfill created on a range of hills laced with beautiful riparian canyons, surrounded by pleasant residential communities, and facing the critical disadvantage of being within one half-mile of a major earthquake fault. The Glenoaks Canyon Homeowners Association has consistently pleaded for the City to establish a specific date when the landfill will be closed so that the City might, at last, fulfill its promises to restore, within a reasonable length of time, the site for recreational purposes. Adding a power plant and an anaerobic digester would be viewed as another serious backward step taken by the City.

The recreational and aesthetic issues relating to the Scholl Canyon Landfill have been made especially pertinent by the "Rim of the Valley" project, which is now being moved forward in the U.S. House of Representatives by Congressman Adam Schiff and by Senator Diane Feinstein in the U.S. Senate. The still beautiful San Rafael Hills have been deeply wounded by the Scholl Canyon Landfill, and they will never be restored to their original beauty, but once the landfill is closed,

restoration can begin, and all of the San Rafael Hills can be made suitable for inclusion as a part of a National Recreation Area.

My experience searching for records is emblematic of the way the projects at Scholl Canyon Landfill are being handled right now. (I cannot speak for Grayson Power Plant because I was late in paying attention to the plant, thinking it was a goner, until I began to realize this week just how pivotal it is to everything that might happen at Scholl Canyon Landfill.) After months and years of unhurriedly, almost casually, letting the public know about its proposals at Scholl Canyon in broad, non-specific outline form, Glendale Water and Power seems to be hurriedly trying to turn these vague proposals into real-life projects, seemingly disguising all that they are doing from the people who would be most affected by the projects and who have been begging to learn the expected impacts from them. In fact, those who are working to push these Mitigated Negative Declarations on the “Biogas Generation Project” and the Anaerobic Digester project seem to be pushing so hard that they have confused not only the public but also many of the City employees who are supposed to be assisting with the projects. The City needs to slow down. It needs to have the proposals re-written as one proposal because all four parts are being created to work together as one interrelated master project.

As in the matter of electricity generation, new technology for waste disposal is rapidly developing. Plasma technology, which promises to be a clean and efficient way of disposing of municipal waste, is now on the verge of advancing beyond the boutique level of application – the disposal of toxic medical supplies, the disposing of waste generated in space exploration, and the disposing of the waste from our country’s newest aircraft carrier, along with a number of other applications in Europe and Japan. Conferences involving this technology, including its application to municipal waste, are being held this year in several places – even in Los Angeles. One was scheduled for Colorado Springs this very week.

If we, together, set our sight on restoration, not further abusive industrialization of the San Rafael Hills, we are sure to find better solutions to our waste disposal and electric power problems than those that are being presented for permitting at this time. Let’s look beyond the next ten to fifteen years to what will work for us fifty to one hundred years in the future. To begin with, let’s find out about the alternatives to disposing of waste in the ground or disposing of it through a messy, complicated anaerobic digestion system. New clean technology is now becoming available for waste disposal. Let’s learn about it and use it.