

Talking Points Against the Proposed Biogas Power Plant at Scholl Landfill

Project: Glendale Water and Power wants to build a gas power plant on the Scholl Landfill

1. **Location:** The Scholl Landfill area is surrounded by recreational and residential areas. The site is currently zoned as R1R and Recreation use, so a conditional use permit (CUP) would be required for the project, which would lead to the industrialization of the area.

2. **Air Quality:** The project would increase emissions relative to the current flares in all six criteria pollutants (nitrogen dioxide, carbon monoxide, volatile organic matter, both categories of particulate matter and sulfur dioxide). For the first three, the increase exceeds the SCAQMD daily significance threshold. These pollutants will decrease air quality in the LA basin and can cause harm to the respiratory system, the central nervous system, the immune system, the reproductive system, cellular function, and brain development in children.

Without paper credits, "NOX, CO, and VOC emissions of the proposed Project will exceed the significance thresholds" (page 25 of EIR).

The **flawed EIR** conveniently zeros out all of the toxic emissions the project will release in excess permissible by law, by subtracting green paper credits from the total emissions. **Subtraction of emissions on paper does not equal an actual decrease in emissions released.** "PM10 and PM2.5 background ambient concentrations already exceed federal or state standards" (City of Glendale Report to Planning Commission 10/06/21).

3. **Fire:** The proposed power plant will be located in a very high-risk fire zone. Wildfire is a huge risk to Glenoaks and Chevy Chase Canyons, Linda Vista, Annandale, and Eagle Rock. Escape routes in these communities are limited due to narrow, single-access roads. The hillsides around the landfill are covered in dry brush and weeds almost year round. There are currently existing fire hazards at Scholl Landfill, but the Project will add more including a high pressure, above ground landfill gas line 2/3 of a mile long, and lube and waste oil tanks. The FEIR states that "the most probable source of fire would be a lube oil fire" but does not provide mitigation.

4. **Aesthetics:** The Power Plant's 60,000-gallon water tank and 40-foot exhaust stacks and flare stack will be visible from surrounding communities and hiking trails. "A component of the proposed project – the 60,000- gallon water tank – is proposed to be located on a **primary ridgeline**. Construction on primary ridgelines is prohibited except under limited circumstances specified in Glendale Municipal Code, Chapter 16.08....Intent and Purpose. **Primary ridgelines are the highest undeveloped and visually dominant ridgelines in a view shed**, 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" (City of Glendale Report to Planning Commission, Packet dated 10/06/21).

5. **Geology and Soils:** EIR states the power plant will be 0.3 miles from the active Verdugo Fault line. The Verdugo Fault line is to the West and the Eagle Rock fault line to the East of the project site. Atop a mountain, seismic waves can be amplified 4 to 5 times those of field waves.

6. **Traffic:** Increased traffic during construction on Glenoaks Blvd., Colorado Blvd, and the intersection of Figueroa Blvd. and the 134 freeway could negatively impact these areas.

7. **Hazards and Hazardous Materials:** The impacts of earthquake or fire on listed hazards such as lube and waste oil tanks, an above-ground natural gas line, and an above-ground pressurized landfill gas line are potentially significant.

8. **Noise:** "The proposed Project would result in noise from the operation of stationary power generating and ancillary equipment, including but not limited to, compressors, coolers, pumps, exhaust fans, exhaust stacks and louvers." The engines will be in operation 24/7. "Construction of the proposed Project will result in noise from the operation of conventional construction equipment and associated vehicles. All construction related activities will be conducted during the work week (Monday through Friday) between the hours of 7:00 am and 7:00 pm" (City of Glendale Report to Planning Comm. 10/06/21). **Results of Noise analysis conducted for 6 locations** daytime and nighttime, 2 per city (Glendale, Pasadena and Eagle Rock) as stated in EIR Appendix J Noise Modeling and Data Collection Sheets:

- 6 occurrences of crickets (1 occurrence per location)
- 2 occurrences of birds chirping (late morning, early afternoon)
- Frogs (daytime)
- Water fountain (nighttime)
- "Quiet Neighborhood" (Glendale, 1:15-1:30pm)
- For Pasadena and Eagle Rock: Freeway noise, local traffic, 1 instance of "trucks hauling in & out of landfill"
- For Glendale: 2 instances of local traffic noise, 1 instance of "heavy trucks/equipment in distance". **Of special note:** for Glenoaks Canyon, record indicates NO instance of Freeway Noise, NO local traffic noise, only 1 instance of "heavy trucks/equipment in distance". All other noises recorded in Glenoaks Canyon are sources from nature.

9. **Cost/Benefit of Project:** The \$40 million for this project is high for the benefit the power will provide. The net power will be lower than 12 megawatts claimed by GWP due to the power needed to clean up the gas and maintenance downtime, as well as the decreasing methane flow rate from the landfill over time. Investing in solar/batteries, for example, would be a better use of the money. The Landfill is expected to reach capacity in about 4-5 years, after which point methane production will continue to drop. Per GWP Mechanical Engineer, by 2032, there won't be enough methane to operate all 4 engines, so 1 will have to be taken offline. Expected end-of-life of Power Plant: 2040 (Planning Commission meeting video 1:36:58 min mark). Is it worth the \$\$\$ investment if the expected lifespan is max 20yrs?