

COALITION for SCHOLL LANDFILL ALTERNATIVES

September 22, 2020

Dear Erik Krause,

I am writing on behalf of the Coalition for Scholl Landfill Alternatives, or CSLA, which is a group of Glendale, Eagle Rock and Pasadena residents who are concerned about the health and wellbeing of our communities, especially regarding the effects of Scholl Canyon Landfill upon the neighborhoods closest to the landfill. We oppose the industrialization of the landfill and favor the closure and cleanup of the landfill in the near future.

CSLA would like to express some concerns about the DEIR that has been prepared in connection with the proposed power plant at Scholl. We ask that these concerns be carefully considered, because they are motivated by our deep commitment to ensuring the safety of our neighborhoods, both now and in the future. The historic wildfires that we have been witnessing make it clear that climate change is here and will exacerbate many of the issues that worry us the most as time passes.

Wildfire: Wildfire is a huge risk to Glenoaks and Chevy Chase Canyons, as well as to the nearby Linda Vista and Eagle Rock neighborhoods. Any discussion of the future of the landfill, due to its location in a designated very high fire zone, must have fire prevention and safety at the forefront. These neighborhoods have mostly narrow, single-access roads. The wildfire plan minimizes the danger and carelessly assumes that an on-site water tank and a fire department more than five miles away are sufficient.

Air Quality: We are also concerned about the unhealthy and dangerous emissions the plant will produce to pollute the air we breathe. There are cleaner solutions to burning the methane and we ask you to consider them.

Pollution from the project will exceed the South Coast Air Quality Management District (SCQAMD) thresholds for four contaminants, but

the DEIR does not discuss either mitigation or using the best available control technology (BACT). Instead, the DEIR assumes that GWP will get priority reserve credits to eliminate the pollutants on paper. Measurements of the pollutants are made from monitors that are not near the landfill.

This is NOT a green project. The priority reserve credits that GWP hopes to receive make it green on paper, but it is NOT green for our lungs, our bodies, our children, or our neighborhoods.

The DEIR also ignores carcinogenic pollutants such as dioxins and furans.

Geology and Soils: The project will be located atop a mountain that sits near a potential 6.7 earthquake fault. Seismic waves on a mountain can be amplified to 4 or 5 times the strength of field waves, and the report both proposes insufficient mitigation measures for threats to power equipment, buildings, tanks, and pipelines and fails to present emergency back-up systems to mitigate damage from earthquakes or fire.

We all got a wake-up call just before midnight on Friday, September 18. The earthquake was a relatively mild one, but it still shook vigorously and for a long time. How would the proposed power plant stand up to a quake directly beneath it? The DEIR doesn't even address that possibility.

Also, the Scholl biogas plant should not be analyzed separately from a holistic Glendale energy plan that includes Grayson Power Plant and the methane from Scholl.

Taking all these matters into account, the DEIR for the proposed plant at Scholl Canyon has not taken into consideration any future closure plans for the landfill in relationship to the plant. Promises to close the landfill and return it to recreational use have been made and broken many times in the past. The landfill is now scheduled to close in 2028. Where, and what, is the plan for that?

This highlights the fundamental problem, not only with the proposed power plant, but, more broadly, with the existence of a landfill, so close to our neighborhoods, unlined in parts, and in a high fire zone. A

replacement for the landfill needs to be identified, and plans need to be made for its cleanup and closure, NOW, rather than at some vague point in the future.

Sincerely,

Marla Nelson
Co-Founder of CSLA

Eileen Hatrick
CSLA Lead, Eagle Rock