



November 15, 2021

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City of Glendale
Community Development Department
633 East Broadway, Room 103
Glendale, California 91026-4386

Via email to ekrause@glendaleca.gov

Re: Comments on Partially Recirculated Draft Environmental Impact Report for Grayson Repowering Project, SCH Number 20161210480

Dear Mr. Krause:

The undersigned members of the Glendale Environmental Coalition (GEC) steering committee provide the following comments, concerns, and questions about the proposed Grayson Repowering Project Partially Recirculated Draft Environmental Impact Report (PR-DEIR), which analyzes impacts of two potential project options currently being developed by Glendale Water and Power (GWP).

GEC is a grassroots group of residents of Glendale and surrounding areas, which was formed in 2017 to advocate for clean energy and against the original proposed Grayson Repowering Project. GEC continues to advocate for clean energy and sound environmental and climate policy in Glendale.

We believe that although the current potential project configurations for the Grayson Repowering are an improvement over the original proposed project, Glendale can develop an energy portfolio that further reduces the city's need for gas-powered energy generation and transitions Glendale more quickly to clean energy.

Since the City Council rejected the original project in 2018, the imperative to avoid new investments in climate-altering infrastructure has become increasingly apparent. The climate emergency has recently been called a "code red for humanity." We are headed on a path toward mass extinctions, accelerating and compounding natural disasters, drought, food scarcity, sea level rise, increases in heat that will make vast areas of currently populated land unlivable, geopolitical instability, and mass suffering.

Every new investment in “natural gas” power equipment locks in climate-harming emissions for decades. Governments across the globe and at all levels are continuing these investments and failing to make the transformative changes needed to avoid further emissions of greenhouse gases and begin to stabilize the climate.

Every ton of greenhouse gases that is emitted makes the situation worse, and every ton of emissions avoided helps avoid the worst possible outcome. Glendale can choose to be part of the solution by avoiding the emissions this project will cause. Approving the Grayson project would instead lock Glendale into many years of continued emissions. We ask the City to take the time to fully explore the potential for Glendale to embrace a clean energy future that does not include any new gas-burning infrastructure.

Clean energy will have substantial local benefits as well, most importantly in improving air quality. Glendale, and especially the area where the project site is located, is heavily burdened by pollution from multiple sources. Reducing pollution will help ease health impacts and improve quality of life.

The Original and Current Grayson Projects

The original Grayson project, for which GWP released a Draft Environmental Impact Report (DEIR) in 2017, proposed to replace existing gas-burning units at the project site (with the exception of Unit 9) with four new units totaling 262 MW net capacity. The public, including GEC, strongly opposed the project. When the project and its Final EIR (FEIR) were presented to the City Council for approval, the City Council declined to certify the FEIR or to approve the project. Instead, the City Council directed staff to investigate clean energy options in place of the proposed project.

In 2019, the City Council approved an Integrated Resource Plan (IRP) that included a cleaner portfolio to meet Glendale’s energy needs. That portfolio included the following:¹

- 28 MW of energy efficiency and demand response, including behind-the-meter batteries
- 23 MW of distributed solar and storage
- 75 MW/300 MWh of local, utility-scale batteries
- 93 MW of Internal Combustion Engines (ICE)

¹ 2019 Integrated Resource Plan, City of Glendale Water & Power, 7/23/2019, <https://www.glendaleca.gov/home/showdocument?id=51814>, p. 9.

At that time, the City Council authorized GWP to proceed with a study and development phase for the utility-scale batteries and ICE units at Grayson.² In March 2020, the City Council authorized a contract for owner's engineering services for this project, which was referred to as "Alternative 6" for purposes of environmental review. On December 15, 2020, GWP presented new configurations of the project with ICE units, one of which is the current "Alternative 7." Staff also presented another potential project at the Grayson Power Plant, involving retaining and refurbishing the existing turbine generator Units 8A and 8BC, and also including a 75 MW battery energy storage system. This potential project was designated "Alternative 8." The City Council directed staff to move forward with evaluating and developing the two project options currently under consideration.

Thus, the original project is no longer under consideration and has been definitively rejected by the City, as shown by the City Council's actions in declining to certify the original project's EIR, directing staff to pursue a cleaner energy portfolio rather than approving the original project, and authorizing contracts for work toward project options with less gas-burning capacity.

In summary, there are currently two options that GWP has presented as the future direction for the Grayson Power Plant. Both include a 75 MW/300 MWh battery energy storage system manufactured by Tesla. One includes the 5 ICE units identified in the 2019 IRP, with 93 MW of thermal capacity, and the other includes the refurbished Units 8A and 8BC, with 101 MW of thermal capacity.³ Both also include a switching station and other elements.

The PR-DEIR is misleading and obscures information

CEQA requires an EIR to present a detailed statement setting forth all significant environmental effects of a proposed project, and information explaining the reasons why the agency has determined that various environmental effects are not significant.

As noted above, the original project is no longer under consideration, having been rejected by the City Council in 2018 and 2019. That project is no longer relevant to the public's and decision makers' understanding of the current project options and their decision about whether one of the proposed project options, or an alternative to them, would be the best choice for Glendale's energy future.

² The information in this paragraph is taken from the December 15, 2020 Report to the City Council on Agenda Item for Amendment of Contracts with Stantec Consulting Services, Inc. and Black & Veatch Corporation, attached to this letter (**Attachment 1**) and also available at <https://glendaleca.primegov.com/Portal/viewer?id=1917&type=0>.

³ This letter refers to the current project options as "Alternative 7" or the Tesla/Wartsila Project Option, and "Alternative 8" or the Tesla/Unit 8 Refurbishment Project Option.

The PR-DEIR continues to treat the now-rejected original project configuration as the “Project” and the two project options as mere alternatives, meaning that the environmental review is based on a fiction. By continuing to treat the original project as a still viable, current project option, the PR-DEIR misleadingly confuses the analysis. It makes comparisons showing the project options as improvements to the original, **rather than dealing with the actual projects and comparing them with thresholds of significance so that decision makers can understand clearly what impacts these project options entail.**

As one example of how the PR-DEIR fails to adequately disclose and evaluate potential impacts of the project options, for “Alternative 7,” the PR-DEIR contains no separate discussion of any of these environmental impact categories that were separately analyzed for the original project: geology and soils, hydrology and water quality, and transportation and traffic. The discussion of several impact categories is less than a page: energy, greenhouse gas emissions, and noise. Similarly, for “Alternative 8,” the PR-DEIR has no separate discussion of these same impact categories, and only three impact categories are discussed for more than one page: aesthetics, air quality, and hazardous materials. Energy is discussed in one paragraph, and greenhouse gases and noise each are discussed in three or fewer paragraphs.

The fallacy at the heart of the PR-DEIR, in measuring the current project options against a rejected prior project option, also means that **the impacts of the two potential projects are not directly compared.** This impedes the ability to draw comparisons between the potential project options – which is a great detriment to decision makers and members of the public hoping to understand and weigh the relative merits of these options to choose between them.

For example, in the area of air quality, making the following comparisons between the project options requires finding information in separate locations in the document:

- Natural-gas fueled generation capacity and the amount of natural gas consumed: p. 5.46 and p. 5.65.
- Criteria air pollutant emissions impacts: pp. 5.46-5.47 and pp. 5.64-5.65.

The same is true of aesthetic impacts, analyzed separately at pages 5.40-5.45 and pages 5.59-5.65, and hazards and hazardous materials, discussed at pages 5.49-5.51 and 5.68-5.70 respectively for the two project options.

Changed Circumstances, Baselines, and Cumulative Impacts

Once an EIR has been certified, a new document would be needed if there are substantial changes in the project, substantial changes in the circumstances under which the project would be undertaken, or new information which was not known and could not have been known at the time the original document was certified. It is reasonable to apply the same standard to a document such as this one, which is tied to an older EIR that was developed several years ago.

In particular, changing circumstances mean that **several baselines in the PR-DEIR are outdated**. The baseline conditions for environmental analysis for the original EIR were conditions as they existed at the time the Notice of Preparation (NOP) for an EIR was published. In this case, the NOP was issued in 2016, meaning that using that as the time for measuring baselines would result in comparing the project against conditions from five years ago, or even earlier depending on what databases were used to establish baseline conditions. The environmental setting for many impact areas has changed significantly since the original baselines were established.

Agencies have discretion to determine baselines to define the environmental setting, but failing to describe the environmental setting is a violation of CEQA. Given the passage of time and the changed circumstances under which the current project options are being undertaken, the PR-DEIR fails to explain whether and why the five-or-more-years-old baselines from the original environmental analysis are still appropriate, or whether new baselines should have been adopted for the current round of environmental review.

The PR-DEIR should have examined and considered updating baselines for several impact areas that it did not. These include, at a minimum, transportation and traffic impacts during construction, hazards and hazardous materials, hydrology and water quality, and noise impacts.

Another area of concern that the PR-DEIR does not address is **environmental justice**. In the December 2016 Initial Study for the original project, the City concluded that the project would have no impact on environmental justice because Glendale is not considered an environmental justice community (original project DEIR, Appendix A, section 2.19, p. 2.55). Information available since that time should have led the City to evaluate environmental justice impacts for the current project options:

The OEHHA's CalEnviroScreen 3.0 was released in January 2017 and updated in June 2018. As explained at the CalEnviroScreen website, "CalEnviroScreen identifies California communities by census tract that are disproportionately burdened by, and vulnerable to, multiple sources of pollution." It shows that census tracts in the vicinity of the project have pollution burdens in the 99th and 100th percentile. There is no indication that the City took this information from 2017 and 2018 into account. See <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>. The communities surrounding the project site are also designated as SB 535 Disadvantaged Communities, which include the top 25% scoring areas from CalEnviroScreen. See <https://oehha.ca.gov/calenviroscreen/sb535>. "SB 535 requires CalEPA to take a multi-pronged approach to identifying disadvantaged communities that includes socioeconomic, public health and environmental hazard criteria." California Environmental Protection Agency's Designation of Disadvantaged Communities Pursuant to Senate Bill 535, <https://calepa.ca.gov/wp-content/uploads/sites/6/2017/04/SB-535-Designation-Final.pdf>, at p. 5.

The PR-DEIR takes an uneven approach to changes in circumstances since the original environmental analysis was completed in addressing cumulative impacts due to other projects when combined with the project.

Section 4.11.2 of the PR-DEIR (p. 4.4-4.6) addresses other projects considered in addressing cumulative impacts, identifying projects originally included that are no longer anticipated to occur, including the Scholl Canyon Landfill Expansion Project and the Green Waste Digester Project. However, the section fails to note any additional project that may now be anticipated, only conclusorily stating that there are no additional related projects since the FEIR was completed. **The PR-DEIR thus uses a current baseline to eliminate previously considered projects, but fails to use a current baseline to add newly anticipated projects.**

Further, **the analysis appears to have been artificially constrained to other power generating projects.** An EIR must consider the cumulative impacts from multiple projects that may cause related impacts, but this is not limited to projects of a similar type.

The PR-DEIR also appears not to have considered projects outside Glendale. As only one example, there is a project currently under consideration at the Los Angeles Zoo, approximately 0.35 mile from the Grayson project site.⁴ The Final EIR for the zoo project identifies that the project will cause emissions of criteria pollutants (see, e.g., LA Zoo FEIR pp. 3.2-30 to 3.2-35, including Tables 3.2-13 through 3.2-17); greenhouse gas emissions (see, e.g., LA Zoo FEIR pp. 3.8-35 to 3.8-40); use and potential release of potentially hazardous materials (see, e.g., LA Zoo FEIR pp. 3.9-20 to 3.9-30); and noise and vibration impacts (see, e.g., LA Zoo FEIR pp. 3.12-21 to 3.12-44). These are all impact categories that are relevant to the Grayson project, so cumulative impacts analysis is needed.

In fact, the LA Zoo FEIR identifies the Grayson Repowering Project in its cumulative projects list (LA Zoo FEIR, p. 3.18-7). It identifies emissions of NO_x as cumulatively considerable as a result of the construction of the zoo project and other projects, including Grayson (LA Zoo FEIR, p. 3.18-17), and discusses cumulative hazardous materials impacts from the zoo project and the Grayson project (LA Zoo FEIR, pp. 3.18-26 to 3.18-27). Note that the LA Zoo FEIR specifically identifies the Grayson project as having the potential to affect the zoo project site because of the risk of hazardous materials release (LA Zoo FEIR at p. 3.9-23).

This one example shows that the PR-DEIR failed to consider obvious related projects for consideration of cumulative impacts of the current project options. There are likely several other past, present, and probably future projects producing related or cumulative impacts. As an example, the State Clearinghouse lists numerous additional projects in Glendale and Burbank

⁴ See Los Angeles Zoo Vision Plan Project Final Environmental Impact Report, available at https://s36593.pcdn.co/wp-content/uploads/2021/06/LA-Zoo-EIR-Final_webres.pdf, at p. 3.9-10.

for which environmental documents have been or are being prepared in the period from January 1, 2019, to present (**Attachments 2 and 3**).

Project Description

The PR-DEIR claims, “There are no changes to the proposed Project” (p. vii). This is simply untrue. As discussed above, the original project no longer exists as a potential, real-world project option. It was rejected over 3 1/2 years ago, and Glendale will not consider that project. **This is a fundamental change to the project that Glendale plans to pursue.** The PR-DEIR does a disservice to all those who wish to use this document to inform themselves about the Grayson Repowering Project by maintaining this fiction.

With respect to the current project options, the PR-DEIR describes both at length, but **important information regarding the project options is absent.** For example, it is not clear where and how the energy needed to charge the Tesla energy storage will be generated. The document makes such statements as the following:

- The BESS, *if charged* with renewable sources, would represent a reduced potential energy impact (p. 5.53 [emphasis added])
- a BESS that *could be charged* [emphasis added] with renewable sources (p. 5.59)

However, there is no assurance that the storage batteries will *actually* be charged with renewables. Regardless of the source, generation of the energy needed to charge the batteries is part and parcel of the overall project.

If imported energy is used, air emissions within the South Coast Air Basin may not be increased, but greenhouse gases would be generated if energy from renewable sources were not available. In fact, the PR-DEIR anticipates just such a possibility, in a footnote to Table 5-15, presenting anticipated air emissions: “Does not include non-local air emissions resulting from generation of electricity to be imported to charge the BESS when renewables are not available” (p. 5.77). The PR-DEIR does not analyze these emissions.

Unfortunately, we are left in the dark as to potential air emission from this source of energy. This appears to be a gap in the analysis that should be addressed in the final environmental impact document. If the BESS may be charged from non-renewable energy sources, this may result in an increase in impacts including, but not limited to, energy/natural gas consumption, air emissions, and greenhouse gases, which should be addressed in the environmental analysis.

The PR-DEIR notes that offsite storage (or “staging”) may be needed during construction (p. 5.38). The off-site location and any impacts to that location and its vicinity must be identified. Vehicle trips between the off-site location and the project site must be included in all impact analyses, including construction traffic and associated air emissions.

Lithium-based storage batteries can be charged and re-charged a limited number of times, and then must be replaced. In its discussion of Alternative 2, the PR-DEIR noted the need for battery replacement and disposal every five to ten years (see pp. 5.15-5.16) but fails to address this for the Tesla/Wartsila and Tesla/Unit 8 Refurbishment Project Options. The EIR must address how many of the large batteries would be replaced, how often, and where they would be transported for ultimate disposal or partial reprocessing, as well as the associated environmental impacts.

Air Quality

Information Gaps and Analytical Inadequacies

Analysis within the PR-DEIR Itself

The analysis in the PR-DEIR is extremely inadequate and fails to disclose important information about air quality impacts. Air quality impacts of the two current project options are discussed in PR-DEIR section 5, Alternatives, with the specific air quality discussion a small part of sections 5.2.6 and 5.2.7. Looking purely at the amount of information presented, the original project DEIR's discussion of that one project's air quality impacts is 47 pages, whereas the combined length of the air quality analysis for the two current potential project options is less than 4 pages. Whereas the original project's EIR considered several topics related to air quality impacts, the PR-DEIR's air quality analysis presents only two sets of information: comparison of criteria air pollutant emissions with the defunct project for each project option (Tables 5-2 and 5-8) and information about health risks to adjacent residential receptors (Tables 5-3 and 5-9).

Analysis in Air Quality Appendices

The PR-DEIR contains Appendix C, titled Updated Air Quality Technical Report. This is actually two separate appendices. Appendix C.1, beginning on page 372 of the PR-DEIR pdf file,⁵ is designated as "Alternative 7," and consists of Foulweather Consulting's Revised Application to the South Coast AQMD for a Permit to Construct for the Grayson Repowering Project, dated June 2021. Appendix C.2, beginning on pdf p. 594, is designated as "Alternative 8." The contents are several pages of data tables and maps. The source of the contents is not identified. The total length of Appendix C.2 is less than 15% the length of Appendix C.1. This means that **the information disclosure for "Alternative 8" air quality impacts is dramatically lower than for "Alternative 7"**.

⁵ This letter uses pdf page references for the PR-DEIR's appendices because of a lack of consecutive page numbers within the appendices.

GWP submitted a permit application package to the SCAQMD for “Alternative 8” before it released the PR-DEIR. That permit application would have presented a much more complete disclosure and afforded the public and decision makers a way to understand and compare the two project options much more directly and fully than is possible with the PR-DEIR. **That permit application should be released with at least 15 days for the public and decision makers to review it before the EIR is planned to be presented to any governmental bodies, including the GWP Commission and Sustainability Commission.**

Omitted Types of Analysis

The PR-DEIR air quality analysis is also much more limited in terms of the range of potential impacts it considers, compared to the EIR for the original project. Here is a list showing examples of analysis that is not included in the PR-DEIR:⁶

- No analysis of construction-related air quality impacts for either project options. Compare with original project FEIR pages 4.3.20-4.3.24.
- No analysis of air quality impacts from facility occupancy. Compare with FEIR page 4.3.25.
- No analysis of air quality impacts from off-road equipment and vehicle trips. Compare with FEIR page 4.3.25.
- No ambient air quality impact analysis comparable to FEIR pages 4.3.36-4.3.40.
- No discussion of impacts under the threshold related to conflicts with or obstruction of the implementation of the applicable air quality plan. Compare FEIR pages 4.3.40-4.3.42.

Analysis of impacts from construction, facility occupancy, and off-road equipment and vehicle trips should have been completed. These two project options include different elements that were not present in the original project, including the Tesla BESS and the switching station, and these impacts may be significant. Without a clear analysis set forth in the environmental review document, decision makers and the public are not able to assess these impacts.

As noted, the PR-DEIR itself does not contain **an ambient air quality impact analysis** comparable to that provided in the original project’s FEIR, at pages 4.3.36-4.3.40. To compare this measure of air quality impacts for “Alternative 7,” the public and decision makers must locate and refer to Appendix C.1, section 4.6 (pdf pp. 401-402).

An understanding of impacts is further impeded because of **differences in how data are presented.** The FEIR presents some of the original project’s results in parts per million, whereas Appendix C.1 provides all results in micrograms per cubic meter. Other differences in the data

⁶ It is possible some of this analysis can be found by searching through the voluminous Appendix C.1 for “Alternative 7.” Appendix C.2 does not have any of these types of analysis.

presentation also render comparison difficult if not impossible, such as multiple values for various pollutants that are identified differently between the two documents, and different presentations of the standards against which impacts are measured.

For “Alternative 8,” there is no ambient air quality impact analysis, so it is impossible to evaluate this measure of impacts for that project option, whether in comparison to the original project, to “Alternative 7,” or to standards of significance.

Difficulty in Comparing Impacts of the Project Options

Because the emissions and health risks of the two project options are presented in separate tables, comparing impacts of the two options being presented to decision makers requires referring to the separate tables. This is another example of how the PR-DEIR’s treatment of these options as mere alternatives to the original project misleads and impedes understanding of the project options’ environmental impacts.

Air Quality Baseline

The PR-DEIR fails to adequately justify or support the baseline used for air quality analysis of the current project options.

Need for Updated Baseline

As discussed previously, the circumstances under which the project will be undertaken have changed substantially since environmental analysis was conducted for the original, now-defunct project. These changes include a key element of the environmental setting for air quality purposes: whereas GWP used to combust landfill gas at the Grayson power plant, after discovering that burning the LFG at Grayson caused emissions to exceed potential health risk notification and action plan thresholds, GWP stopped burning LFG at Grayson on April 1, 2018 (p. xiv). Under these circumstances, use of the original baseline is inappropriate. The City recognized as much in the PR-DEIR, stating that it updated the environmental impact analysis to consider not only the original baseline conditions while LFG was being combusted at Grayson, but also an updated baseline “that considers flaring of landfill gas at Scholl Canyon Landfill” (p. xiv).

As explained, the current Grayson Repowering Project is two project options that were identified and selected for analysis in July 2019 and December 2020, respectively.

In stating that the City updated the baseline to a time when LFG was flared at the landfill instead of at Grayson, the PR-DEIR appears to have done what sound decision making, CEQA, and logic require: update the baseline to account for the environmental conditions at the time

that the City Council decided to pursue the new project options, i.e., in 2019 or 2020. But reviewing the PR-DEIR and its air quality appendix shows that the City failed to do this.

Problems with the 2018 Updated Baseline

Difficulty Finding Source of Baseline Values

To begin, we had to identify the source of the baseline values used in the PR-DEIR. The PR-DEIR's Alternatives section does not present any discussion explaining the updated baseline for air quality analysis, but it presents Tables 5-2 and 5-8, which each refer to an "Updated 2018 Baseline" (pp. 5.46, 5.65). Those tables present the same updated baseline values, in tons/year: NO₂: 28.5; CO: 56.9; PM₁₀: 8.6; VOC: 6.1; SO₂:1.0.

These values are consistent with values presented in PR-DEIR Appendix C.1's Appendix D1, May 2020 Air Dispersion Modeling Report and Health Risk Assessment, Prepared by Trinity Consultants (Table 2-1, pdf p. 495; see pdf pp. 490-491). They are also the same as the values for "Updated 2018 Baseline" in PR-DEIR Table 5-8, for "Alternative 8" (p. 5.65), and with values for "Baseline Emissions Based on SCAQMD AER 2018" in Appendix C.2 (pdf p. 599). One can conclude therefore that the information at pdf p. 599 accurately sets forth the per-unit emissions that underlie the "Updated 2018 Baseline" for the two project options.

The first observation is procedural: it should not be this difficult to ferret out the source of the baseline values presented in Table 5-2. An environmental review document should provide information, not hide it and require readers to search through multiple appendices to identify such a basic piece of information.

LFG Combustion Not Removed from Baseline

It is apparent that the updated baseline is inconsistent with the PR-DEIR's claim that the baseline was updated to reflect the change in circumstances when LFG stopped being combusted at Grayson: The values in the "Baseline Emissions Based on SCAQMD AER 2018" table show that emissions from combustion of LFG in Boilers 4 and 5 are included in these values. This means that the claim made on page xiv of the PR-DEIR is misleading or inaccurate.

Moreover, **the selection of this "updated" baseline is illogical and unsupported.** The point of a baseline is to compare a project's impacts against the environmental setting at the time the project is contemplated – in this case, that means updating the baseline is meant to account for the fact that the emissions at the project site do not include LFG emissions.

The PR-DEIR's use of an updated baseline from a time when LFG was combusted at Grayson is also **inconsistent with the treatment of the baseline for greenhouse gas emission impacts for**

“**Alternative 8**”⁷. While the PR-DEIR itself does not include any information about a baseline for greenhouse gases, Appendix C.2 indicates a calculation of baseline emissions that excludes LFG emissions, “because these emissions are counted toward Biogas Renewable (Scholl Canyon) Project” (pdf p. 623). If emissions were counted toward that project for greenhouse gases, it is reasonable to assume the same is true for criteria pollutants and air toxics. The analysis of air quality impacts should also exclude LFG combustion from its baseline but does not (compare pdf p. 599 with pdf p. 623). If there is a sound reason why these impact areas are treated differently, the City should explain it.

Different Baseline in Appendix C.1

A further problem with the PR-DEIR’s treatment of air quality baselines is that the appendix meant to support the air quality analysis uses a different baseline than the PR-DEIR’s updated baseline, and in fact argues against a 2018 baseline.

The PR-DEIR’s Appendix C.1, Foulweather Consulting’s revised SCAQMD permit application for Wartsila version of the project (either “Alternative 6” or “Alternative 7”), presents and attempts to justify a different baseline period than is used in the PR-DEIR’s main text (see pdf p. 398).

Hypothetical Baseline

Appendix C.1 utilizes a 2016-2017 average baseline, claiming it is more representative of long-term boiler operations than 2018 and 2019 (pdf p. 399). It then adjusts the actual emissions reported to the SCAQMD in a number of ways, leading to the use of a hypothetical baseline rather than a true representation of the environmental setting against which an EIR’s analysis of a project’s impacts should be measured.

Boiler emissions of NO_x were adjusted to reflect current maximums for new equipment (pdf p. 400). Emissions of VOC, SO₂, and PM₁₀/PM_{2.5} were not adjusted (pdf p. 400). At that time, a considerable portion of gas used to fuel the boilers was landfill gas (Figure 3, pdf p. 400). Use of landfill gas was discontinued in April 2018. Thus, reductions in air emissions asserted in this analysis may be at least partially due to elimination of landfill gas in favor of cleaner burning natural gas to fuel the boilers.

For the existing turbines, NO_x and VOC emissions were adjusted using BACT emission rates, while SO₂ and PM₁₀/PM_{2.5} emissions were not (pdf p. 400).

⁷ As discussed below, we found no information about a baseline for greenhouse gas emissions in the analysis for “Alternative 7.”

After these adjustments were made, the AERs were further adjusted and reduced by various factors based on the number of days the equipment was operated (pdf pp. 400-401, including Table 18; see also Appendix C.1's Appendix E, pdf pp. 570-573).

Thus, instead of a baseline reflecting actual emissions, or even actual emissions adjusted to reflect a change in fuel, **the analysis is based on a hypothetical baseline**, which very well may not lead to an accurate portrayal of changes in emissions due to the proposed project. This approach has been rejected under CEQA because it can result in illusory comparisons and mislead the public and decision makers about the true impacts of a project, subverting the EIR's informational purpose.

Undermined Baseline

Beyond the issue of an improper hypothetical baseline, the baseline discussion in Appendix C.1 also undermines the updated baseline used in the PR-DEIR. The 2016-2017 baseline is justified partly because Appendix C.1 claims that 2018-2019 operations were not representative of "normal plant operations" (pdf p. 398).

The selection of an older baseline for Appendix C.1 is problematic from a CEQA standpoint because the justification is that the actual baseline conditions at the time of the analysis didn't represent historical use. But **a baseline is not meant to represent what has happened in the past** – it should represent the conditions that will be changed by the project.

This discussion in fact supports the need for an updated baseline that represents conditions in 2019 or later. As shown in Figure 3 on pdf p. 400, landfill gas was still being used in 2018 and there was significantly less heat input (i.e., combustion of gas) in 2019 compared with prior years.⁸ The year 2019 is not an anomaly to be disregarded – rather, it appears more representative of the current amount of emissions against which the project's air quality impacts should be compared.

The discussion in Appendix C.1 points up yet another issue with the justification for baselines: It uses equipment failures to partly justify use of a 2016-2017 baseline, but half of the units discussed were down for at least part of 2017, so **rejecting 2018 and 2019 because of equipment outages while using 2017 is illogical** (pdf p. 399).

In short, the discussion in Appendix C.1 undermines the "Updated 2018 Baseline" in the PR-DEIR in several ways.

⁸ Appendix C.1's Appendix E shows with even more detail the fact that significant amounts of LFG were included in the 2016-2017 baseline calculations (pdf pp. 572-573). This is entirely inconsistent with the PR-DEIR's claim that its updated baseline represents the LFG being flared at Scholl rather than burned at Grayson.

Inconsistencies

Yet another problem with the PR-DEIR related to baselines is that its inconsistencies themselves undermine the analysis and the conclusions regarding air quality impacts. Baselines are fundamental to sound analysis of impacts in CEQA, and an EIR needs to be clear about those baselines to fulfill its informational purpose. Yet here, **the PR-DEIR uses a baseline that is different from the main technical document attached as support of the PR-DEIR's conclusions.** And the inconsistency extends beyond that: **Appendix C.1's main text is inconsistent with its own Appendix D1**, which uses a 2018 baseline even though Appendix C.1 rejected such a baseline (pdf p. 495). What is the reason for this inconsistency?

The many issues with the air quality baselines presented in the PR-DEIR lead to a lack of confidence in the analysis and cause us to doubt that the true impacts of the project options have been disclosed in a way that is understandable and that can guide sound decision making.

We ask that in responding to comments, the City include information about the baseline emissions in 2019, and also include information about 2020 emissions, and emissions in 2021 to the extent they are available, so that the public and decision makers can know whether the level of emissions remained steady compared with 2019 or declined even farther. This information would provide full disclosure and aid in evaluating impacts and guiding decision making. Even if the City believes the 2018 updated baseline is appropriate, the City should provide additional information about emissions in the time since then, in order to more fully inform the public and decision makers and provide a greater understanding of the circumstances surrounding this important decision.

Thresholds

The air quality section of the PR-DEIR does not compare emissions against thresholds of significance (see pp. 5.46-5.47, 5.65-5.66, and Tables 5-2 and 5-8). The prior EIR has discussion of significance determination based on mass daily thresholds, but no comparable analysis appears in the PR-DEIR for either current project option. (See FEIR pp. 4.3.33-4.3.34 and Table 4-26.)

By not comparing air quality impacts to significance thresholds, the PR-DEIR makes it difficult to understand whether the current project options will have significant impacts based on the relevant significance criteria.

Furthermore, on p. 5.47, the PR-DEIR states that for VOCs, "Alternative 7" emissions are lower than the original project's emissions and "will be offset through the application of emissions reductions credits pursuant to SCAQMD requirements *if warranted*" (emphasis added). Similar language appears at page 5.66 for "Alternative 8." This conclusory and uninformative statement fails to disclose whether these impacts are significant. By comparison, the discussion of health risks plainly shows a comparison to thresholds of significance (Tables 5-3 and 5-9). The failure

to do the same for criteria pollutants is a failure to disclose impacts and provide information needed to evaluate these alternative versions of the project.

Sensitive Receptors

Appendix C.1 contains a discussion of sensitive receptors as part of its section on consistency with laws, ordinances, regulations and standards, on pdf pages 411-412. Page 411 states that Table 25 lists sensitive receptors within a mile of the project. **This statement and Table 25 give a misleading impression of the sensitive receptors in the vicinity.**

Table 25 is titled "Schools and Childcare Facilities in Project Area." The closest receptor listed is 0.49 mile from the project. Yet page 411 notes that the nearest residential receptor is approximately 694 feet from emission sources, and the nearest worker/commercial receptor is located approximately 572 feet from emission sources. These receptors are both much closer to the project site (0.13 mile and 0.11 mile, respectively) than any of the receptors listed in the table. The discussion should not present information suggesting these nearby residential and worker/commercial receptors are not among the closest sensitive receptors, as Table 25 does.

Health Risk Assessment

PR-DEIR Table 5.3 (p. 5.47) summarizes health risks to residential receptors for "Alternative 7." The identified measurement for the maximum individual cancer risk is 0.5. **That value appears to be inconsistent with values in the technical appendix.** The Health Risk Assessment in Appendix C.1 contains the following values: pdf p. 527, Table D-1, shows cancer risk values of 2.0, 1.5, and 1.0 in a million for the PMI, MEIR, and MEIW, respectively. The MEIW appears to be the applicable value. In the Air Dispersion Modeling and Health Risk Assessment Alternative 6 and 7 Addendum, Table 4-4 on pdf p. 555 indicates a cancer risk of 1.71 in one million for the MEIR. Table B-1 on pdf p. 564 and B-7 on pdf p. 567 appear consistent with these numbers. None of these values are the 0.5 in one million value shown in PR-DEIR Table 5-3.

For "Alternative 8," Health Risk Assessment materials are provided at pdf pages 603-621. These materials include several pages of data tables, followed by several pages of maps. The maps are identified as "showing the locations of modeling results." The appendix does not contain any explanation of why those locations were selected for modeling. Also, results are presented as representing residential risks and worker risks. For cancer risk, chronic output, and chronic 8-hour modeling, the residential and worker modeling locations are identical. For acute risks, there are two modeling locations each for residential and worker risks – one of the residential modeling locations is in the same location as the location for all cancer and chronic risk modeling, but the comparable worker modeling location is closer to the project site. No explanation is given to explain (1) the use of the same modeling location for residential and worker risks for most scenarios, (2) the use of a different modeling location for one worker risk measure but not for the others, and (3) the inclusion of a second modeling location for each of

the acute risk scenarios but not for the cancer and chronic risk scenarios. By comparison, for “Alternative 7,” Appendix C.1 shows different locations for residential and worker risks. (See pdf pages 523-525 and 556-558.) **This appears to be an analytical inconsistency for the two project options.**

Maximum Operating Hours Assumptions

Analysis of air quality emissions for “Alternative 7” presents different assumptions about how many hours the equipment would operate. This is confusing and misleading, making the analysis inadequate.

Inconsistencies in Assumptions

The assumptions underlying the air quality analysis are unclear and appear to fluctuate in different parts of the PR-DEIR document.

For “Alternative 7,” Appendix C.1 states that the analysis of criteria pollutant emissions was based on assumptions that each engine would operate “a total of 1120 hours per year with up to 280 startups/shutdowns per year, and remaining operations at full load” (pdf p. 392). **This phrasing suggests that the 1120 hours per year includes the hours for startups/shutdowns, but it is not entirely clear.** Additionally, pdf p. 392 refers to Appendix C.1’s Appendix B for detailed calculations, and pdf p. 395 states that the emissions during normal operations exclude emissions from commissioning and startup periods. Appendix C.1’s Appendix B’s Appendix Table B-4 sets for the operating schedule for the analysis. It shows 1120 normal/full load operating hours listed separately from cold starts, warm starts, and hot starts (pdf p. 483). This suggests that the total of 1120 hours per year in Appendix C.1 excludes the hours for startups/shutdowns, so that the engines would actually operate more than 1120 hours per year. **This is an apparent inconsistency with the statement on pdf page 392.**

Additionally, the PR-DEIR analyzes startup emissions separately from normal operating emissions because the former are higher (pdf p. 393). Tables 9 and 12 in Appendix C.1 (pdf pp. 394 and 395) note that for each startup hour, 30 minutes are treated as emitting at the startup rate and 30 minutes are treated as emitting at the full-load operation rate. If these values are used, then the total assumed hours per year are $1120 + 280 \times 0.5$, or 1260 hours. Also, the analysis assumes a total of 1120 hours per year of normal/full load operations. It is unclear whether that includes the 30 minutes from each startup hour or only full hours of normal/full load operation, or whether those 30 minutes in startup hours are unaccounted for, so that the total hours would be above 1260. **Did this analysis in fact assume 1260 hours, or a higher number?**

A different set of numbers appears in another part of Appendix C.1: Appendix C.1’s Appendix D1, Trinity Consultants’ May 2020 Air Dispersion Modeling Report and Health Risk

Assessment (see pdf pp. 490-491). Appendix D1 has its own Appendix A, in which Appendix Table A-1 presents project emissions based on assumptions that each unit would operate 980 hours per year at normal conditions and 280 hours per year in startup mode (pdf p. 514, Table A-1, note B). The total, 1260, is the same as one scenario noted above, but the startup hours is double that in Appendix C.1, raising **the possibility that the higher emissions in startup/shutdown mode are overcounted in one analysis or undercounted in the other. The discrepancy should be explained.**

For "Alternative 8," Appendix C.2's first page of data shows an operating schedule that assumes 1200 hours (pdf p. 597).⁹ The second page shows "Annual Op. hours: 1,200" and shows the number of normal operating hours per year as 1035.40 and the hours of startups/shutdowns per year as 156, suggesting the *total* hours assumed for "Alternative 8" is 1191.4, approximately 1200 hours, different from 1120 and 1260 (pdf p. 598).¹⁰ **This is yet another inconsistency in assumed operating hours.**

We were not able to find an explanation for these inconsistencies in assumptions. In the absence of an explanation, the PR-DEIR's analysis is called into question. If an explanation appears within the document, please provide page references.

Inconsistencies Between Assumptions and Potential Equipment Operations

Appendix C.1 shows that GWP seeks to run the equipment longer than the time assumed for the analysis of air quality impacts. As stated below, Appendix C.1 states that the analysis of criteria pollutant emissions was based on assumptions that each engine would operate a total of 1120 hours per year with up to 280 startups/shutdowns per year, and with operations at full load. The next sentence states, "**These assumptions are not intended to be imposed as permit limitations**" (pdf p. 392).

Additionally, application forms submitted as part of the application package to SCAQMD list the operating schedule as follows (pdf pp. 427, 437, 447, 457, 467):

Normal: up to 10 hours/day; up to 5 days/week; up to 50 weeks/yr
Maximum: 24 hours/day; 7 days/week; 52 weeks/yr

⁹ We presume this refers to hours, but the units are not disclosed.

¹⁰ The information in the tables on pdf p. 598 is not clear. The number of normal operating hours per year is listed in the table showing emissions, but the number of startup/shutdown hours per year are not listed there. It is therefore unclear whether the Annual PTE values represent only normal operating hours or are inclusive of startup/shutdown operations. Since the values in the far right column match those in the summary table, which appears to be the source of the values in Table 5-8 on PR-DEIR page 5.65, please explain how the data tables show how the startup/shutdown hours per year are included in the total values.

The assumed number of hours in the analysis, although not entirely consistent, is generally in the range of 1120 to 1260 hours, or only 13-14% of the maximum operating schedule in the application forms. **The analysis was based on this assumed range of hours, and is not valid if the units may run for a higher number of hours.**

If there is in fact a potential for operating more than the amount for which analysis was done, the analysis must be updated. It is very likely that if the units are run much more than the amount assumed in the present analysis, the new analysis will conclude that there are significant air quality impacts.

On the other hand, if this analysis is carried through to the final environmental review document, then there must be conditions placed on operation of the plant to ensure that the units are operated within the limit of the operating schedule on which the analysis was based. **These conditions must be included both in the SCAQMD permit and as binding conditions of approval by the City Council. The CEQA analysis cannot be used as the basis for approving this project unless it is definitively established that the gas-combusting units will not run longer than the amount in the analysis.**

Needed Corrections in PR-DEIR

The PR-DEIR incorrectly states the difference between the generation capacity of “Alternative 8” and the original project. Rather than 172 MW difference, the difference is 161 MW. The error leads to potential confusion as readers compare “Alternative 7” and “Alternative 8.”

The PR-DEIR causes further confusion by explaining, in the paragraph above Table 5-8, that criteria pollutant and GHG emissions were estimated for the “Tesla/Wartsila Repowering Project” and that the table summarizes the emissions for the “Tesla/Wartsila Repowering Project” – in other words, for “Alternative 7,” not “Alternative 8.”

Greenhouse Gases

The PR-DEIR discusses greenhouse gas (GHG) emission impacts for each of the two project options in about one-half page (pdf pp. 156-157, 176). **Half a page of analysis is not adequate for one of the most crucial potential impacts of a power plant – its contribution to climate change.** This itself is a serious flaw, but that is compounded by other flaws discussed below.

GHG Emission Baseline

Baseline Hidden in Appendices

The PR-DEIR states that it uses an updated greenhouse gas (GHG) emissions baseline, like for air quality, with the landfill gas flared at Scholl Canyon rather than combusted at Grayson (p.

xiv). The PR-DEIR itself does not compare emissions with – or even provide – a baseline. Because the baseline was updated, this comparison is an important but missing part of the analysis in the PR-DEIR. To locate it, the reader must hunt through the appendices.¹¹

Inconsistency with Air Quality Baseline

Once found, the baseline calculation shows another issue. The baseline calculation in Appendix C.2 shows a breakdown of emissions by gas-burning unit (pdf p. 623). Although the table shows landfill gas was burned in Boilers 3 through 5, emissions are shown as zero. A note explains that GHG emissions from LFG combustion were excluded from the baseline because those emissions were counted toward the Scholl Canyon project. **This is inconsistent with the air quality analysis, as noted previously. Air quality and greenhouse gas impacts are closely related, and should be treated the same way in the PR-DEIR.**

Inadequate Disclosure and Support for Baseline

The selection of the baseline is problematic, and as we discussed for air quality, inconsistencies and inadequate justifications for the selected baselines are a significant flaw of the PR-DEIR. In the case of greenhouse gas emissions, the lack of disclosure means that the public can't even evaluate the appropriateness of the selected baseline and look for inconsistencies – because **no information is provided to identify when these emissions occurred** (pdf p. 623). This is a substantial gap that must be remedied with sufficient time for the public and decision makers to examine the assumptions underlying this baseline. Please provide information regarding the source of the information in Appendix C.2 regarding the GHG emission baseline.

Flaws in Analysis

First, there are internal inconsistencies and weaknesses in the GHG emissions analysis.

For “Alternative 7,” there are inconsistent values for emissions. The PR-DEIR states that the emissions of greenhouse gases (CO₂e/year) for “Alternative 7” will be 54,063 MTCO₂e/year (pdf p. 157). In Appendix C.1, there is a page setting out the emission estimate, with the 54,063 MTCO₂e/year value (pdf p. 398). The reader is referred to Appendix B for detailed calculations. Appendix Table B-5 is the only relevant table (pdf p. 484). **The total MTCO₂e/year shown is 54,075 – close to the 54,063 in the PR-DEIR, but not the same. The inconsistency is not explained.** We were unable to find another source for the 54,063 value. If one exists in the document, please provide page references.

¹¹ We were also unable to find a baseline identified in Appendix C.1. That appendix refers the reader to Appendix C.1's Appendix B for detailed calculations (see pdf p. 398). Appendix Table B-5 is the only relevant table in Appendix B (pdf p. 484). No baseline is shown. A baseline calculation does appear in Appendix C.2, at pdf p. 623.

For “Alternative 8,” the PR-DEIR states that the GHG emissions would be 66,925 MTCO₂e/year (pdf p. 176). Appendix C.2’s single page of GHG emissions data (pdf p. 623) shows this value as only one component of the total project GHG emissions. **The total is 67,195 MTCO₂e/year. There is no explanation of why the PR-DEIR does not use that value.** As the calculated total, it is the better value to disclose in the PR-DEIR.

Second, **there are several inconsistencies between the way the analysis is done for the two project options.** There does not appear to be any good reason for analyzing these two project options differently, and the inconsistencies impede the ability to draw direct comparisons.

- The analyses for the two project options are based on different numbers of operating hours: For “Alternative 7,” the analysis is based on 1260 hours of equivalent full-load operation; for “Alternative 8,” the analysis is based on 1200 annual operating hours (compare pdf p. 484 with pdf p. 623).
- As already observed, “Alternative 7” emissions are not compared with a baseline, but “Alternative 8” emissions are.
- Also as already noted, the “Alternative 7” analysis considers only direct emissions from the gas-burning units, whereas the “Alternative 8” analysis includes other emissions – from facility occupants.

Third, both of these analyses assume a number of total operating hours over a year that is low compared with the potential maximum run time (again, the analysis for “Alternative 7” assumes 1260 equivalent full-load operating hours per year, and the analysis for “Alternative 8” assumes a total of 1200 annual operating hours [pdf pp. 484, 623]; there is evidence showing that GWP does not intend to limit operations to that schedule [pdf p. 392, pp. 427, 437, 447, 457, 467]. **As for the air quality analysis, unless it is guaranteed that the gas-combusting units will not run longer than the respective amount for the selected project option, this analysis cannot be used as a basis for approval of the project.**

Fourth, the analysis is limited to only some sources of GHG emissions, and **other emission sources are improperly omitted.**

- For “Alternative 7,” the first missing information is emissions from facility occupants, which was included for “Alternative 8.”
- For both, the analysis omits mention of the switching station and Tesla BESS, so it is undisclosed whether those would emit GHGs or not.
- No construction-related emissions are disclosed.
- There is no analysis of GHG emissions from project-related use of off-road equipment and vehicle trips.
- The PR-DEIR does not analyze GHG impacts related to energy produced outside Glendale but used to charge the Tesla BESS (see above section on Project Description).

Compare the original project’s FEIR, section 4.5, which shows analysis of emission sources other than the gas-burning equipment itself. Moreover, a fair comparison of the two project options

must include emissions from all sources for both, accounting for differences between the options.

Piecemealing

Concerned residents of Glendale have noted repeatedly that the City should have considered the impacts of the Grayson Repowering and Scholl Canyon Biogas Projects together. This is one example of possibly improper piecemealing of environmental analysis. While the PR-DEIR acknowledges the potential for a power generation facility at Scholl Canyon, anticipated emissions are not presented or discussed. At a minimum, the total emissions for the two projects must be presented and analyzed in the discussion of cumulative impacts. As part of that discussion, **the analysis must account properly and logically for the flaring of LFG as part of the baseline emissions, without double counting or otherwise misleading analysis.**

Also, as noted before, the source of the power for charging the Megapack storage has been left up in the air. **All emissions associated with charging the batteries must be identified**, whether or not they are generated in the South Coast Air Basin. This is doubly important for greenhouse gases.

An off-site area may be used for storage during construction. Impacts to the off-site area are not addressed at all, and should be.

All of the above actions are facets of the proposed project and will assist in achieving the stated project objectives. As such, they must be identified, quantified, and analyzed in one EIR.

Alternatives

The City should consider and present analysis for alternatives that reduce the amount of gas-burning equipment compared with the current project options, which both involve approximately 100 MW of gas capacity. For example, "Alternative 7" includes 5 ICE units. In 2019, when the Wartsila engines were first proposed to City Council, **council members expressed a strong desire for staff to work toward reducing or eliminating the need for the 5 units**, including by exploring additional distributed energy resources and additional transmission capacity. The PR-DEIR does not present any new project alternatives that accomplish that goal.

GWP will have access to more transmission than previously expected since the 2019 IRP report and alternatives were discussed. This includes 72 MW more transmission available in 2027. The PR-DEIR acknowledges this change in circumstances, **but this transmission is not sufficiently addressed through consideration of new alternatives.** This also includes 25 MW of transmission associated with the Eland project beginning in 2024, which the PR-DEIR appears not to mention at all. The analysis of alternatives should be updated to account for these changes in the circumstances for Glendale's energy planning.

The original EIR's Alternative 2, which is discussed in PR-DEIR at pages 5.9 to 5.17, is a potentially viable starting point for an alternative that eliminates gas-burning investments, but the PR-DEIR does not use this opportunity to explore its potential. The PR-DEIR did not update the discussion of Alternative 2 to account for increased transmission. The analysis states that the City would use a total supply of 287 MW composed of 48 MW from Unit 9, 39 MW from Magnolia, and 200 MW imported over transmission lines (p. 5.10). But the City has obtained additional transmission rights, as noted above. This is material because the City rejected this alternative at least in part because of inadequate transmission to import electricity to charge the batteries to serve daytime load, and also because the PR-DEIR states that the power supply would be less than the City's peak loads but that appears to not be the case with the increased transmission. **The increased transmission should be reflected in the PR-DEIR's discussion of Alternative 2. It is also unclear whether the additional transmission was included in the analysis of the N-1-1 contingency on p. 5.12.**

The information about Alternative 2 in the PR-DEIR is also confusing and inconsistent, because much of the discussion appears to suggest that the storage system would need to be extremely large compared with the current Tesla BESS-based project options (large enough to store 2940 MWh of energy), but in the table on page 5.74, the amount of energy storage for Alternative 2 is listed as 161 MW. **Please clarify the size of battery system under consideration for Alternative 2.**

The PR-DEIR's reasons for rejecting the energy-storage alternative appear to be based on several assumptions that are in question, particularly given evolving technology and cost reductions. Reasons given in the PR-DEIR for rejecting the energy-storage alternative that should be revisited include, but are not limited to, the following (see pp. 5-12-5:15):

- PR-DEIR: The storage system would need to be capable of storing and supplying 2,940 MWh. The PR-DEIR does not clearly explain why this is the amount of stored energy that would be needed to meet load during a four-day period. Although shortfalls are cumulative, some amount of energy will be available to recharge the batteries each day; the PR-DEIR does not offer any calculations to justify the 2,940 MWh value.
- PR-DEIR: The amount of storage needed is too large to be placed at Grayson. The PR-DEIR limits its consideration to placing storage at this single site, and should consider distributing storage
- PR-DEIR: The cost of 2,940 MWh is approximately \$588,000,000 based on the Clean Energy proposals received by GWP (approx. \$200,000/MWh and higher). First, the need for 2,940 MWh should be re-examined. Second, the Clean Energy proposals were received in 2018. Third, it is clear that the City did not conduct any research for updated costs of energy storage, and relied solely on values from a single RFP from 2018, despite

significant cost reductions since then. BloombergNEF shows that costs have been falling and are expected to continue to do so, with a 2020 price of \$137/kWh.¹²

- PR-DEIR: Batteries have a finite life and require periodic augmentation, and maintenance contract costs could be several million dollars per year. This information is stated conclusorily, with no factual support. However, it should be obvious that gas-burning equipment also has a finite life and requires maintenance and repair over *its* lifetime. Without full disclosure of costs for all potential projects, it is impossible for the public and decision makers to evaluate all alternatives' comparative costs and benefits and make informed decisions.
- PR-DEIR: The costs for the energy storage alternative do not include the cost to produce and transmit the energy to charge the batteries. A fair comparison would provide the cost to fuel the gas-burning engines in the current project options, as well as the costs to produce and transmit the energy to charge the Tesla BESS.

Options with greater battery storage than proposed in "Alternative 7" and "Alternative 8" were dismissed in the Ascend Analytics 100% Clean Energy by 2030 Feasibility Study (March 1, 2021, <https://glendaleca.primegov.com/Portal/viewer?id=2735&type=2>) for financial reasons; however, **options with greater storage capacity should have been pursued thoroughly in the PR-DEIR, either in Alternative 2 or in new alternatives**, so that when the costs of the various projects are presented, different alternative pathways to clean energy are available to compare. Higher costs alone do not render a project alternative infeasible and are not sufficient reason to decline to analyze a potential alternative.

Moreover, in considering costs, they should be looked at over decades, and must include escalating costs for gas and carbon offset credits, costs to convert any potential gas units to green hydrogen, and other costs associated over the life of the project. Decisions about which project alternatives to pursue because of cost considerations must take all direct and indirect costs into account in order to provide a complete and fair disclosure of information for decision makers.

Other potential alternatives that could be feasible and reduce the project's environmental impacts include one posed in the 2019 IRP, as scenario F: 56 MW ICE and 100 MW BESS (see PR-DEIR p. ix, and Integrated Resource Plan, 7/23/2019, <https://www.glendaleca.gov/home/showdocument?id=51814>, p. 51.) The City should consider alternatives based on this scenario and also taking into account the additional transmission on the SWAC line (72 MW in 2027) and the additional transmission from the Eland Project (25 MW in 2024). Additionally, the IRP explains that the amount of imported renewable

¹² BloombergNEF, The Spectacular Energy Storage Growth, May 12, 2021, attached as **Attachment 4**, and available at https://www.climateinvestmentfunds.org/sites/cif_enc/files/knowledge-documents/thespectacular_energy_storage_growth.pdf, p. 3.

resources was limited to the amount above local clean energy and load reduction that would be needed to meet SB 100 RPS goals (see IRP at p. 37). This suggests that it may be feasible to add more imported renewable resources to reduce the need for thermal generation. The City should consider that as part of examining potential alternatives based on the scenario F framework. Note that at least some additional imported renewable resources must be feasible, because the IRP presented two other scenarios that included 140 MW each of imported solar and wind than scenario F did (see IRP at p. 51). Rather than stopping with meeting the RPS requirement, the City should aim to maximize clean, carbon-free energy sources for a portfolio that will make Glendale a leader in the new energy future.

Conclusion

We seek the best outcome for Glendale's energy future. We do not believe that the current project options represent that best outcome, and we urge the City to do what the City Council and residents have been requesting since 2017: develop an energy plan that accelerates progress toward 100% clean energy, and that avoids new investments in gas-burning equipment and locked-in greenhouse gas emissions and local air pollution for years to come. Transitioning is necessary given the accelerating impacts of the climate crisis and the city's moral imperative to stop contributing to that crisis.

We also ask that the City conduct a more searching analysis of the current project options, rather than the abbreviated analysis that was enabled by treating the project as mere alternatives to a project that Glendale walked away from almost 4 years ago.

We request that the final environmental review document for the Grayson project be released at least 30 days before it is presented to the GWP Commission and Sustainability Commission. Commissioners, who are volunteers serving the public in their personal time, will need time to fully review and consider the information in the final document. Members of the public, who also will be making time to review the EIR in their personal time, are concerned and wish to have a meaningful opportunity to review additional disclosures in the final environmental review document. Releasing the final document according to the statutory minimum timeline will not give the public sufficient opportunity to review the document and communicate remaining concerns to commission and City Council members before the commissions and Council deliberate and make their decisions regarding the Grayson project. Glendale should provide a full and complete opportunity for public participation in the process for making this consequential decision.

Sincerely,

Glendale Environmental Coalition steering committee members

Monica Campagna	Jane Potelle	Kate Unger
Elise Kalfayan	Paul Rabinov	