700

Krause, Erik

From: Earthjustice <action@earthjustice.org> on behalf of Amy Koss <info@earthjustice.org>
Sent: Saturday, November 18, 2017 7:05 PM
To: Krause, Erik
Subject: Please reject plants to rebuild the Grayson natural gas power plant

Nov 18, 2017

Deputy Director of Community Development Erik Krause

Dear Deputy Director of Community Development Krause,

We don't need it. We don't want it. Stop the greed at the expense of our health and safety!

As a Glendale resident, I'm writing to express my strong opposition to a new gas-fired power plant in our community. Please reject plans to rebuild the Grayson natural gas power plant in favor of clean energy alternatives. 700-1

Thousands of people live and work directly within the Grayson project's impact zone, which includes schools, daycare centers, homes for the elderly and offices. Glendale's air quality is already terrible--it's time to invest in an energy grid that can turn that around. 700-2

Furthermore, Glendale does not urgently need the power from this project. Even without Grayson, the city has enough energy to cover our daily needs most of the time. Our summertime spikes can be met with clean energy, just as other communities around California are doing.
The Grayson project leaves Glendale sitting on (and Glendale residents paying for) way more electricity than we need. 700-3

We have the means to power our city with renewable energy. Let's not tie ourselves to fossil fuel infrastructure that will harm our families and our checkbooks for decades. Cities across California are ditching fossil fuel power and we can too. It's time for Glendale to step into a clean air, clean energy future. 700-4

Sincerely,

Amy Koss

Glendale, CA 91206
amygkoss@sbcglobal.net

701

Krause, Erik

From: Maria Azcue <meryazcue@hotmail.com>
Sent: Saturday, November 18, 2017 2:40 PM
To: Krause, Erik; Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Letter regarding Grayson plant

Dear Mr. Krause and Glendale governmental officials

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 701-1

We live in Atwater Village but we are constantly going to Glendale for shopping, eating out and going to see our health care providers. We love Glendale and we think about moving to that city one day. It would be a shame that this beautiful city gets ruined. I know the plant will provide jobs but clean energy plants also provide jobs. In a long term clean energy plants are more efficient. Finally, measurements such as planting trees can be implemented to reduce the negative ecological impact and to beautify the area. . I don't deny that Glendale needs energy and work sources but let's invest in the future in a good way, in a proper way without polluting our air and compromising our health. 701-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 701-3

Regards,

María Azcue
Los Ángeles .

Sent from my iPhone

Krause, Erik

From: Marty Theis <mafatdesign@gmail.com>
Sent: Saturday, November 18, 2017 10:18 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: STOP Grayson EIR

Dear Mr. Krause ~

I am writing to express my VERY strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR! 702-1

I live on West Doran Street very dangerously close to this plant. This would mean extreme Health Risks to me
and my surrounding neighbors (as if living in this polluted city as is, isn't enough)! 702-2

I call on the City to STOP the CEQA process and immediately commission an independent study of CLEAN energy alternatives for powering Glendale! There are so many other alternatives! And your plant is on the "phasing out"
list anyway! 702-3

Let your archaic Plant DIE!

This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not
by the consultants who have been working on the Grayson EIR!

If you love this City and our Planet, STOP your heinous actions NOW!! 702-4

In Truth for a Better Healthier World . . .

Martin F. Theis

703

Krause, Erik

From: Megan Hulse (megannhulse@gmail.com) Sent You a Personal Message <automail@knowwho.com>
Sent: Saturday, November 18, 2017 12:18 PM
To: Krause, Erik
Subject: Grayson Power Plant: Go Away

Dear Mr. Erik Krause,

As a resident of Glendale and a GWP customer, I'm writing to voice my strong opposition to rebuilding and expanding the Grayson Power Plant. Rather than sinking $500 million into a polluting fossil fuel facility, I urge you to seize the opportunity to make Glendale a showcase for clean energy alternatives. The list of concerns with this project is long. 703-1

? Emissions of carbon monoxide, nitrogen dioxide, sulfur dioxide, small particulate matter and other pollutants will increase across the board. This will worsen already bad air quality in an area that houses two elementary schools (Mark Keppel and Franklin), the Disney Creative Campus and Disney Children's Center, the residential neighborhoods of Pelanconi Estates and Moorpark, and popular outdoor spaces such as the John Ferraro Athletic Fields and Glendale Narrows Riverwalk. 703-2

? Greenhouse gas emissions, which are heating up our region and increasing risks of drought and fire, will increase by more than 415,000 tons of carbon dioxide each year. That's an increase of six times over the current levels, and equivalent to adding 90,000 cars to Glendale's roads! 703-3

? The plant would be built in an identified liquefaction zone. That makes the plant itself, and the gas piping and transmission systems, all highly vulnerable to a serious earthquake. Apart from the obvious safety risks, this raises questions about its ability to maintain reliable service in an emergency. 703-4

? Spending $500 million on a single, large fossil fuel plant creates huge financial risks for Glendale ratepayers. With efforts underway in Sacramento to move the state to 100% clean energy by 2045, it's more likely than not that we'll be paying for this plant long after it's been forced to shut down. 703-5

Glendale doesn't even need this much power. Your own reports forecast falling demand for electricity in Glendale. If demand is falling, why would we need to build a plant that increases generating capacity by 33% as this proposal does? 703-6

This project would lock us into legacy technology that harms public health just at a time when the rest of the state is surging forward. I urge you to halt efforts to expand Grayson and commission a study of clean energy alternatives. 703-7

Sincerely,

Megan Hulse
1495 Glenwood Dr.
Scotts Valley, CA 95066
megannhulse@gmail.com
(831) 439-1793

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

704

Krause, Erik

From: Molly Margraf <molly.margraf@gmail.com>
Sent: Saturday, November 18, 2017 8:38 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 704-1

We have just recently purchased a house in Glendale, and have a daughter just under two years old. We are concerned about the value of our house decreasing due to the pollution, but MORE IMPORTANTLY, the negative health effects this plant may have on our tiny daughter, and the children who live around us. 704-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 704-3

Regards,

Molly Margraf
Glendale Resident

Sent from my iPhone

705

Krause, Erik

From: Jaika Lara <larajaika@gmail.com>
Sent: Saturday, November 18, 2017 5:09 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 705-1

My husband and three year old child moved here this Spring mainly because of the quiet and congestion free streets - we knew we could raise our family here and make this our forever home. We have a little one on the way and I'm sadden you're thinking on doing something that can jeopardize my kids health, and for what!? 705-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 705-3

Regards,

Jaika Lara-Quirt /Glendale - Glenwood North

Sent from my iPhone

706

Krause, Erik

From: Symes, Neil <neil@symes.tv>
Sent: Saturday, November 18, 2017 9:36 AM
To: Krause, Erik; Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: September 2017 Draft EIR

Sir or Madam –

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 706-1

I am very concerned about the direction of the country and world with recent national political events, and its critical that all levels of government that have the ability to look at fossil fuel usage and if we can continue our great lifestyle here in Glendale without using them. I am not saying we should NOT use them, just requesting that we look at other options. 706-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 706-3

Regards,

Neil & Angela Symes
La Crescenta

707

Krause, Erik

From: Nick Chandler <nickchandler23@gmail.com>
Sent: Saturday, November 18, 2017 9:40 AM
To: Krause, Erik; Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson Power Plant in Glendale - Please Read

Dear Mr. Krause,

Thank you for your time. I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 707-1

Please consider the harm you will willing do to the children who go to the many schools in the immediate area, as well as the direct damage the power-plant will have on the people who live here including my wife and I. 707-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 707-3

The year is 2017, there must be a way to protect your profits as well as the health and safety of the community. 707-4

Regards,

Nicholas Chandler
600 Salem St.
Glendale, CA 91203

--

Nick Chandler
Key Assistant Location Manager
Speechless
-
Twentieth Century Fox
call or text: 561-445-1526

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708

Krause, Erik

From: Dennis Doyle <dennisdoyleharp@gmail.com>
Sent: Saturday, November 18, 2017 4:08 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

As a life-long resident of Glendale and professor at Glendale Community College, I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 708-1

I live in this neighborhood and intend to stay here after I retire. Any decision which increases the pollution in the area would be bad for my own and neighbors' health. I suggest we spend money toward cleaner solar energy sources. 708-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 708-3

Regards,

Dennis Doyle
1135 Norton Ave
Glendale, CA 91202

709

Krause, Erik

From: Earthjustice <action@earthjustice.org> on behalf of narek haritourian <info@earthjustice.org>
Sent: Saturday, November 18, 2017 5:35 PM
To: Krause, Erik
Subject: Please reject plants to rebuild the Grayson natural gas power plant

Nov 18, 2017

Deputy Director of Community Development Erik Krause

Dear Deputy Director of Community Development Krause,

a gas powered plant us a huge step backwards for our city.

As a Glendale resident, I'm writing to express my strong opposition to a new gas-fired power plant in our community. Please reject plans to rebuild the Grayson natural gas power plant in favor of clean energy alternatives. 709-1

Thousands of people live and work directly within the Grayson project's impact zone, which includes schools, daycare centers, homes for the elderly and offices. Glendale's air quality is already terrible--it's time to invest in an energy grid that can turn that around. 709-2

Furthermore, Glendale does not urgently need the power from this project. Even without Grayson, the city has enough energy to cover our daily needs most of the time. Our summertime spikes can be met with clean energy, just as other communities around California are doing. 709-3
The Grayson project leaves Glendale sitting on (and Glendale residents paying for) way more electricity than we need.

We have the means to power our city with renewable energy. Let's not tie ourselves to fossil fuel infrastructure that will harm our families and our checkbooks for decades. Cities across California are ditching fossil fuel power and we can too. It's time for Glendale to step into a clean air, clean energy future. 709-4

Sincerely,

narek haritourian

glendale, CA 91204
narek.haritourian@gmail.com

710

Krause, Erik

From: Rachel Pringle (rachelapringle@gmail.com) Sent You a Personal Message <automail@knowwho.com>
Sent: Saturday, November 18, 2017 4:12 PM
To: Krause, Erik
Subject: Grayson Power Plant: Go Away

Dear Mr. Erik Krause,

As a resident of Glendale and a GWP customer, I'm writing to voice my strong opposition to rebuilding and expanding the Grayson Power Plant. Rather than sinking $500 million into a polluting fossil fuel facility, I urge you to seize the opportunity to make Glendale a showcase for clean energy alternatives. The list of concerns with this project is long. 710-1

? Emissions of carbon monoxide, nitrogen dioxide, sulfur dioxide, small particulate matter and other pollutants will increase across the board. This will worsen already bad air quality in an area that houses two elementary schools (Mark Keppel and Franklin), the Disney Creative Campus and Disney Children's Center, the residential neighborhoods of Pelanconi Estates and Moorpark, and popular outdoor spaces such as the John Ferraro Athletic Fields and Glendale Narrows Riverwalk. 710-2

? Greenhouse gas emissions, which are heating up our region and increasing risks of drought and fire, will increase by more than 415,000 tons of carbon dioxide each year. That's an increase of six times over the current levels, and equivalent to adding 90,000 cars to Glendale's roads! 710-3

? The plant would be built in an identified liquefaction zone. That makes the plant itself, and the gas piping and transmission systems, all highly vulnerable to a serious earthquake. Apart from the obvious safety risks, this raises questions about its ability to maintain reliable service in an emergency. 710-4

? Spending $500 million on a single, large fossil fuel plant creates huge financial risks for Glendale ratepayers. With efforts underway in Sacramento to move the state to 100% clean energy by 2045, it's more likely than not that we'll be paying for this plant long after it's been forced to shut down. 710-5

Glendale doesn't even need this much power. Your own reports forecast falling demand for electricity in Glendale. If demand is falling, why would we need to build a plant that increases generating capacity by 33% as this proposal does? 710-6

This project would lock us into legacy technology that harms public health just at a time when the rest of the state is surging forward. I urge you to halt efforts to expand Grayson and commission a study of clean energy alternatives. 710-7

Sincerely,

Rachel Pringle
1555 Hillside Dr
Glendale, CA 91208
rachelapringle@gmail.com
(818) 515-2370

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

711

Krause, Erik

From: Sean Bradshaw <seanb.3.12@gmail.com>
Sent: Saturday, November 18, 2017 3:13 PM
To: Gharpetian, Vartan; Agajanian, Vrej; Devine, Paula; Najarian, Ara; Krause, Erik
Subject: Re: Grayson Repowering project

Dear Council,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 711-1

I have lived in Glendale for five years now and I can tell you firsthand how I've witnessed the increase in pollution simply by living next to the 2.
I don't want to move but I will definitely have to consider it, if this power plant proceeds with no hope of greener solutions. 711-2
Glendale will look like the deep valley, causing the smog to triple and in turn the housing price will plummet and no one will want to live here.

Don't you want you and your children to have clean air? 711-3

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 711-4

Thank you,

Sean Bradshaw

712

Krause, Erik

From: Suzie Vlcek <suzievlcek@gmail.com>
Sent: Saturday, November 18, 2017 9:29 PM
To: Krause, Erik; Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson PP emissions

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 712-1

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 712-2

Regards,

Suzie Vlček
Los Angeles

Sent from my

713

Krause, Erik

From: Tamsin Rawady <trawady@gmail.com>
Sent: Saturday, November 18, 2017 8:22 PM
To: Krause, Erik
Subject: Grayson Repowering Project

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 713-1

My family and I live in Atwater Village and our 5-year-old attends John Muir Elementary in Glendale and our 2.5-year-old attends GPC Preschool also in Glendale. We all spend most of our days and nights in Glendale and Atwater Village. 713-2

We are very concerned about the possible pollutants that may be caused by the expansion of this power plant. We understand that the current power plant needs to be upgraded however, this is 2017 and there must be alternatives that won't affect our children's health. 713-3

We call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 713-4

Regards,

Tamsin Rawady

Atwater Village

714

Krause, Erik

From: Victoria Escobar <dylanjsmom@hotmail.com>
Sent: Saturday, November 18, 2017 10:02 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: I strongly oppose the Grayson project.

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 714-1

To continue this way shows no respect and responsibility for our youth and the future generations. 714-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 714-3

Regards,

Victoria Escobar, La Crescenta CA

715

Krause, Erik

From: Vivian Smith <viviansmith09@gmail.com>
Sent: Saturday, November 18, 2017 10:00 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 715-1

As a mother to a 2.5 yr old, I feel a strong need to fight for a healthier living environment for him now and for his future. Also, as a 3 time cancer survivor, keeping my exposure to environmental toxins low is incredibly important as well. 715-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 715-3

Regards,

Vivian Smith
Highland Park, Los Angeles

716

Krause, Erik

From: Yu-Ling Tse <yuling.tse@gmail.com>
Sent: Saturday, November 18, 2017 8:52 PM
To: Krause, Erik
Subject: Please Stop the Grayson Expansion!!!

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 716-1

My family resides in the Northeast part of Eagle Rock, near to the fwy and the Glendale City Dump. Both of my kids are on inhalers due to poor air quality and the effect it has had on their health. 716-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 716-3

Regards,

Yu-Ling Tse , Los Angeles, CA(Eagle Rock)

717

Krause, Erik

From: Abby Wills <abbywills@mac.com>
Sent: Sunday, November 19, 2017 9:01 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my complete frustration and utter opposition to the Grayson repowering project. 717-1

My children are in harms way. 717-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 717-3

Regards,

Abby Wills, Glendale

Abby Wills, MA
Co-Founder, Shanti Generation
https://na01.safelinks.protection.outlook.com/?url=www.shantigeneration.com&data=02%7C01%7Cekrause%40glendaleca.gov%7C28da7c7e8a714e796c2208d52fd3b2ba%7Ce5115311f6c3421bbc03a5d8c79bf546%7C0%7C0%7C636467508651670446&sdata=OX7ck16luhA8f32vcbkFHIiwCIwgRK7SPKrLIIKFR1E%3D&reserved=0

718

Krause, Erik

From: Earthjustice <action@earthjustice.org> on behalf of Adrine Dermenjian <info@earthjustice.org>
Sent: Sunday, November 19, 2017 8:38 PM
To: Krause, Erik
Subject: Please reject plants to rebuild the Grayson natural gas power plant

Nov 19, 2017

Deputy Director of Community Development Erik Krause

Dear Deputy Director of Community Development Krause,

Our community wants clean energy alternatives instead of expensive and dangerous fossil fuel dinasour. 718-1

As a Glendale resident, I'm writing to express my strong opposition to a new gas-fired power plant in our community. Please reject plans to rebuild the Grayson natural gas power plant in favor of clean energy alternatives. 718-2

Thousands of people live and work directly within the Grayson project's impact zone, which includes schools, daycare centers, homes for the elderly and offices. Glendale's air quality is already terrible--it's time to invest in an energy grid that can turn that around. 718-3

Furthermore, Glendale does not urgently need the power from this project. Even without Grayson, the city has enough energy to cover our daily needs most of the time. Our summertime spikes can be met with clean energy, just as other communities around California are doing.
The Grayson project leaves Glendale sitting on (and Glendale residents paying for) way more electricity than we need. 718-4

We have the means to power our city with renewable energy. Let's not tie ourselves to fossil fuel infrastructure that will harm our families and our checkbooks for decades. Cities across California are ditching fossil fuel power and we can too. It's time for Glendale to step into a clean air, clean energy future. 718-5

Sincerely,

Adrine Dermenjian

Glendale, CA 91206
adrine3@gmail.com

719

Krause, Erik

From: Earthjustice <action@earthjustice.org> on behalf of Alexandra Rosenthal <info@earthjustice.org>
Sent: Sunday, November 19, 2017 2:07 PM
To: Krause, Erik
Subject: Please reject plants to rebuild the Grayson natural gas power plant

Nov 19, 2017

Deputy Director of Community Development Erik Krause

Dear Deputy Director of Community Development Krause,

Thank you for reading my letter.

As a Glendale resident, I'm writing to express my strong opposition to a new gas-fired power plant in our community. Please reject plans to rebuild the Grayson natural gas power plant in favor of clean energy alternatives. 719-1

Thousands of people live and work directly within the Grayson project's impact zone, which includes schools, daycare centers, homes for the elderly and offices. Glendale's air quality is already terrible--it's time to invest in an energy grid that can turn that around. 719-2

Furthermore, Glendale does not urgently need the power from this project. Even without Grayson, the city has enough energy to cover our daily needs most of the time. Our summertime spikes can be met with clean energy, just as other communities around California are doing.
The Grayson project leaves Glendale sitting on (and Glendale residents paying for) way more electricity than we need. 719-3

We have the means to power our city with renewable energy. Let's not tie ourselves to fossil fuel infrastructure that will harm our families and our checkbooks for decades. Cities across California are ditching fossil fuel power and we can too. It's time for Glendale to step into a clean air, clean energy future. 719-4

Sincerely,

Alexandra Rosenthal

Glendale, CA 91202
alexlane03@gmail.com

720

Krause, Erik

From: alice wise <wiseal22@icloud.com>
Sent: Sunday, November 19, 2017 12:03 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 720-1

[Personalized text] – feel free to draw on your experience or any of the points in the talking points

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 720-2

Regards,

[Name] [City]

721

Krause, Erik

From: Earthjustice <action@earthjustice.org> on behalf of Aline Arsenian <info@earthjustice.org>
Sent: Sunday, November 19, 2017 1:37 PM
To: Krause, Erik
Subject: Please reject plants to rebuild the Grayson natural gas power plant

Nov 19, 2017

Deputy Director of Community Development Erik Krause

Dear Deputy Director of Community Development Krause,

Thank you for reading my letter.

As a Glendale resident, I'm writing to express my strong opposition to a new gas-fired power plant in our community. Please reject plans to rebuild the Grayson natural gas power plant in favor of clean energy alternatives. 721-1

Thousands of people live and work directly within the Grayson project's impact zone, which includes schools, daycare centers, homes for the elderly and offices. Glendale's air quality is already terrible--it's time to invest in an energy grid that can turn that around. 721-2

Furthermore, Glendale does not urgently need the power from this project. Even without Grayson, the city has enough energy to cover our daily needs most of the time. Our summertime spikes can be met with clean energy, just as other communities around California are doing.
The Grayson project leaves Glendale sitting on (and Glendale residents paying for) way more electricity than we need. 721-3

We have the means to power our city with renewable energy. Let's not tie ourselves to fossil fuel infrastructure that will harm our families and our checkbooks for decades. Cities across California are ditching fossil fuel power and we can too. It's time for Glendale to step into a clean air, clean energy future. 721-4

Sincerely,

Aline Arsenian

Glendale, CA 91202
when_broken_easily_fixed@yahoo.com

722

Krause, Erik

From: Alisa Angelone <alisacando@gmail.com>
Sent: Sunday, November 19, 2017 1:30 PM
To: Najarian, Ara; Krause, Erik; Devine, Paula; Agajanian, Vrej; Gharpetian, Vartan; Sinanyan, Zareh
Subject: Grayson repowering Project

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 722-1

We enjoy Glendale parks and shops, so we spend our time and money in your city. 722-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 722-3

Regards,

Alisa Angelone
Burbank, CA

723

Krause, Erik

From: Arvin Torosian <torosian.a@gmail.com>
Sent: Sunday, November 19, 2017 2:45 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 723-1

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 723-2

Regards,

Arvin Torosian
La crescenta, CA

724

Krause, Erik

From: Amanda Walsh <amandawalsh6@yahoo.com>
Sent: Sunday, November 19, 2017 1:24 PM
To: Krause, Erik; Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson Power Expansion

Dear Mr. Krause,

As your neighbor, I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 724-1

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 724-2

Regards,

Amanda Walsh, Atwater Village.

725

Krause, Erik

From: Amelia French <ameliaf@mac.com>
Sent: Sunday, November 19, 2017 5:47 AM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 725-1

I live in the area that would be affected by the expansion, am the mother of a three year old boy, and am expecting my second child next year. My family's health is the most important thing in the world to me, and I am deeply concerned about the sheer volume of emissions and particle pollution that this will create, in the air that my childrens' young lungs will play in all day and sleep in all night. 725-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 725-3

Regards,

Amy French, Atwater Village

726

Krause, Erik

From: Amelie Cherlin <ameliecherlin@protonmail.com>
Sent: Sunday, November 19, 2017 8:37 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson repowering project

Dear Mr. Krause,

I oppose the Grayson repowering project. I often work in Glendale and I take my 2-year-old to Cerritos park to play. I'm a freelancer so I can choose where I work, fortunately, so if the repowering project goes through I will have the luxury of avoiding Glendale and Atwater Village. But many other people don't have that choice. 726-1

This is a dirty project and as Californians, we are supposed to be better than this. 726-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 726-3

Wishing you a happy Thanksgiving,
Amelie Cherlin, Los Feliz

Krause, Erik

From: Amy Calhoun <ptbb22@yahoo.com>
Sent: Sunday, November 19, 2017 3:01 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson repowering project

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 727-1

My 3-year-old daughter and I have asthma and have a large garden in our backyard. I would hate to have to move if my daughter's asthma is triggered more frequently due to significantly increased air pollution or to worry about eating the food grown in our yard. 727-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 727-3

Regards,

Amy Sanchez
Glendale, CA

Amy Calhoun Sanchez, PT, DPT, OCS, CSCS, NSCA-CPT

728

Krause, Erik

From: Ana Melkon <anamelkon@yahoo.com>
Sent: Sunday, November 19, 2017 11:16 PM
To: Krause, Erik; Najarian, Ara; Sinanyan, Zareh; Agajanian, Vrej; Devine, Paula; vgharapetian@glendaleca.gov
Subject: StopGrayson plan

The Commission of City of Glendale,

Glendale is my home town for over 20 years and I care for my city and dedicated lots of volunteer hours that are consists of my life for Glendale community and have all the rights to request you to do the minimum: I want the commission a truly independent study of clean energy alternatives before proceeding with Grayson power plant. 728-1

We want clean air in Glendale, for our families, for children who do not have have the power to speak for them-self. We want our children to be healthy and have safe environment where they can play and have a happy childhood. There are children in our neighborhood that have asthma, please think about them. I think no one has a right to take away from children the clean air. 728-2

And again I want the commission a truly independent study of clean energy alternatives before proceeding with Grayson power plant. 728-3

Best regards,

Anahit Melkonyan
Glendale resident

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729

Krause, Erik

From: Ana Santaolalla <therapywithana@gmail.com>
Sent: Sunday, November 19, 2017 8:52 PM
To: Krause, Erik
Subject: Please STOP Grayson

Dear Mr. Krause,

I am writing to express my STRONG opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 729-1

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale.

This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 729-2

Regards,

Ana Santaolalla, LMFT, RYT

323-682-0113
THERAPYWITHANA.COM
Linkedin Profile

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730

From: Papazian, Eliza
To: Krause, Erik
Cc: Godinez, Christine; van Muyden, Gillian
Subject: FW: Please STOP GRAYSON
Date: Monday, November 20, 2017 5:08:19 PM
Attachments: image001.png
image002.png
image003.png
image004.png

Eliza Papazian | City of Glendale | Management Services
613 East Broadway, Suite 200 | Glendale, CA 91206 | (818) 548-4844 | epapazian@glendaleca.gov

From: Ana Santaolalla [mailto:therapywithana@gmail.com]
Sent: Sunday, November 19, 2017 8:58 PM
Subject: Please STOP GRAYSON

Glendale resident and new mother here writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. This project poses serious and irreversable environmental and health concerns. 730-1 730-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. 730-3

This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR.

Thank you for your time,

Ana Santaolalla, LMFT, RYT

323-682-0113
THERAPYWITHANA.COM
Linkedin Profile

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731

Krause, Erik

From: Angie Daly <angiedaly@me.com>
Sent: Sunday, November 19, 2017 11:06 AM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 731-1

We are raising children in Glendale and are very concerned about their developing lungs. Clean energy is the future and this feels like ten steps back for future generations and our environment. 731-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 731-3

Regards,

Angie Daly
Glendale

732

Krause, Erik

From: Angie Howard <angie.howard@wsu.edu>
Sent: Sunday, November 19, 2017 10:14 AM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 732-1

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 732-2

Regards,

Angie Howard, Glendale

733

Krause, Erik

From: Earthjustice <action@earthjustice.org> on behalf of Areti Katsaros <info@earthjustice.org>
Sent: Sunday, November 19, 2017 9:38 PM
To: Krause, Erik
Subject: Please reject plants to rebuild the Grayson natural gas power plant

Nov 19, 2017

Deputy Director of Community Development Erik Krause

Dear Deputy Director of Community Development Krause,

Keep this out of Glendale, please!

As a Glendale resident, I'm writing to express my strong opposition to a new gas-fired power plant in our community. Please reject plans to rebuild the Grayson natural gas power plant in favor of clean energy alternatives. 733-1

Thousands of people live and work directly within the Grayson project's impact zone, which includes schools, daycare centers, homes for the elderly and offices. Glendale's air quality is already terrible--it's time to invest in an energy grid that can turn that around. 733-2

Furthermore, Glendale does not urgently need the power from this project. Even without Grayson, the city has enough energy to cover our daily needs most of the time. Our summertime spikes can be met with clean energy, just as other communities around California are doing.
The Grayson project leaves Glendale sitting on (and Glendale residents paying for) way more electricity than we need. 733-3

We have the means to power our city with renewable energy. Let's not tie ourselves to fossil fuel infrastructure that will harm our families and our checkbooks for decades. Cities across California are ditching fossil fuel power and we can too. It's time for Glendale to step into a clean air, clean energy future. 733-4

Sincerely,

Areti Katsaros

Glendale, CA 91204
elpitha7@aol.com

734

Krause, Erik

From: Arin Rao <arin_simonian@me.com>
Sent: Sunday, November 19, 2017 1:00 AM
To: Krause, Erik; Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Opposition to Grayson Repowering Project

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 734-1

My family lives in Glendale, and we know that our health and the health of our community is at stake. 734-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 734-3

Regards,

Arin Rao

Glendale Resident

735

Krause, Erik

From: arlenesalazar21@gmail.com
Sent: Sunday, November 19, 2017 8:44 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft 735-1

I live near where this wants to take process and I oppose. 735-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 735-3

Regards,

Arlene
Los Angeles

Sent from my iPhone

736

Krause, Erik

From: Artin Ohanian (romeoa76@yahoo.com) Sent You a Personal Message <automail@knowwho.com>
Sent: Sunday, November 19, 2017 12:05 PM
To: Krause, Erik
Subject: Grayson Power Plant: Go Away

Dear Mr. Erik Krause,

As a resident of Glendale and a GWP customer, I'm writing to voice my strong opposition to rebuilding and expanding the Grayson Power Plant. Rather than sinking $500 million into a polluting fossil fuel facility, I urge you to seize the opportunity to make Glendale a showcase for clean energy alternatives. The list of concerns with this project is long. 736-1

? Emissions of carbon monoxide, nitrogen dioxide, sulfur dioxide, small particulate matter and other pollutants will increase across the board. This will worsen already bad air quality in an area that houses two elementary schools (Mark Keppel and Franklin), the Disney Creative Campus and Disney Children's Center, the residential neighborhoods of Pelanconi Estates and Moorpark, and popular outdoor spaces such as the John Ferraro Athletic Fields and Glendale Narrows Riverwalk. 736-2

? Greenhouse gas emissions, which are heating up our region and increasing risks of drought and fire, will increase by more than 415,000 tons of carbon dioxide each year. That's an increase of six times over the current levels, and equivalent to adding 90,000 cars to Glendale's roads! 736-3

? The plant would be built in an identified liquefaction zone. That makes the plant itself, and the gas piping and transmission systems, all highly vulnerable to a serious earthquake. Apart from the obvious safety risks, this raises questions about its ability to maintain reliable service in an emergency. 736-4

? Spending $500 million on a single, large fossil fuel plant creates huge financial risks for Glendale ratepayers. With efforts underway in Sacramento to move the state to 100% clean energy by 2045, it's more likely than not that we'll be paying for this plant long after it's been forced to shut down. 736-5

Glendale doesn't even need this much power. Your own reports forecast falling demand for electricity in Glendale. If demand is falling, why would we need to build a plant that increases generating capacity by 33% as this proposal does? 736-6

This project would lock us into legacy technology that harms public health just at a time when the rest of the state is surging forward. I urge you to halt efforts to expand Grayson and commission a study of clean energy alternatives. 736-7

Sincerely,

Artin Ohanian
1434 Graynold Ave
Glendale, CA 91202
romeoa76@yahoo.com
(818) 313-1757

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

Krause, Erik

From: Artin Ohanian <artin76@icloud.com>
Sent: Sunday, November 19, 2017 12:58 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 737-1

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 737-2

Regards,

[Artin Ohanian] [Glendale, CA]

Krause, Erik

From: Arvin Bautista, Greasy Pig Studios <arvin@greasypigstudios.com>
Sent: Sunday, November 19, 2017 1:26 PM
To: Krause, Erik
Subject: Stop the Grayson Plant

We are new residents of Glassell Park but also longtime patrons of Glendale businesses... we look forward to raising our children here and contributing to the community. The neighborhood continues to develop further as a safe, secure, and good place to raise a family, but this expansion poses harm to the residents that will be felt for years to come. Please do not allow this expansion to go through. 738-1

Arvin Bautista & Lynn Hamilton
Glassell Park

--
Arvin Bautista
Greasy Pig Studios
www.greasypigstudios.com

739

Krause, Erik

From: Earthjustice <action@earthjustice.org> on behalf of Audrie Barthold <info@earthjustice.org>
Sent: Sunday, November 19, 2017 7:38 PM
To: Krause, Erik
Subject: Please reject plants to rebuild the Grayson natural gas power plant

Nov 19, 2017

Deputy Director of Community Development Erik Krause

Dear Deputy Director of Community Development Krause,

Thank you for reading my letter.

As a Glendale resident, I'm writing to express my strong opposition to a new gas-fired power plant in our community. Please reject plans to rebuild the Grayson natural gas power plant in favor of clean energy alternatives. 739-1

Thousands of people live and work directly within the Grayson project's impact zone, which includes schools, daycare centers, homes for the elderly and offices. Glendale's air quality is already terrible--it's time to invest in an energy grid that can turn that around. 739-2

Furthermore, Glendale does not urgently need the power from this project. Even without Grayson, the city has enough energy to cover our daily needs most of the time. Our summertime spikes can be met with clean energy, just as other communities around California are doing.
The Grayson project leaves Glendale sitting on (and Glendale residents paying for) way more electricity than we need. 739-3

We have the means to power our city with renewable energy. Let's not tie ourselves to fossil fuel infrastructure that will harm our families and our checkbooks for decades. Cities across California are ditching fossil fuel power and we can too. It's time for Glendale to step into a clean air, clean energy future. 739-4

Sincerely,

Audrie Barthold

Glendale, CA 91205
abellue77@gmail.com

740

Krause, Erik

From: Bayard Banta <bayardbanta@yahoo.com>
Sent: Sunday, November 19, 2017 11:12 AM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 740-1

As a Glendale home owner, tax payer, and family man I am deeply concerned with the Grayson repowering project. 740-2

- Not only does the project threaten long term climate stability, it will also negatively affect short term health outcomes for thousands of people living near the plant and throughout Glendale and neighboring Burbank and Northeast Los Angeles..
- The new plant *increases* local emissions of several "criteria pollutants," incl. volatile organic compounds (VOCs) carbon monoxide (CO), sulfur oxide (SOx), nitrogen oxide (NOx), and small particulates (PM10, PM2.5)
- Emissions of NOx and VOC in particular are estimated to "exceed SCAQMD's[15] daily mass emissions significance threshold" – a high bar!

740-3

The repowering project threatens my property, my family, and their future and the health of all Glendale and Burbank residents. 740-4

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 740-5

Regards,

Bayard Banta
Glendale

741

Krause, Erik

From: Becky hartman edwards <hartwards@gmail.com>
Sent: Sunday, November 19, 2017 7:54 AM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 741-1

Our family lives nearby in Los Feliz and our kids play in both a soccer league and baseball league with games in Glendale. Our son has asthma and it's already a challenge on days when the air quality is poor. Expanding the Grayson power plant will only add to the air pollution issues we face. 741-2

GWP has not been maintaining the equipment as they should. With a few million dollars they could keep the plant running for another decade or so which would give the city plenty of time to work out a better plan. And with renewable prices falling rapidly, we could probably find less expensive alternatives. 741-3

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 741-4

Regards,

Rebecca Hartman Edwards
2337 Observatory Ave.
Los Angeles, CA 90027

742

Krause, Erik

From: bethsna@gmail.com on behalf of Beth Hoffman <bhoffma@calstatela.edu>
Sent: Sunday, November 19, 2017 11:21 AM
To: Krause, Erik; Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson Plant

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 742-1

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 742-2

Regards,

Beth Hoffman, Los Angeles

--

Beth Hoffman, PhD, MPH
Special Assistant to the President on Los Angeles Based Curricula
Associate Professor
Department of Public Health
California State University Los Angeles
319 Simpson Tower
5151 State University Drive
Los Angeles, CA 90032
Phone: (310) 691-6726
Fax: (323) 343-6400

743

Krause, Erik

From: Bill Smith <bsemfy@gmail.com>
Sent: Sunday, November 19, 2017 10:40 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

No increase in pollutants PLEASE. 743-1

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 743-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 743-3

Regards,

Bill Smith. Los Feliz CA

744

Krause, Erik

From: Bowie Sims <bowiesims@icloud.com>
Sent: Sunday, November 19, 2017 8:32 PM
To: Krause, Erik; Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; zsinanyan@glen.mac.com
Subject: Grayson repowering project

Good evening…

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 744-1

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 744-2

Regards,

Cheers!
Joanna Sims
Los Feliz Hills, Los Angeles

745

Krause, Erik

From: Brendal l <brendalaue@gmail.com>
Sent: Sunday, November 19, 2017 8:55 PM
To: Krause, Erik
Subject: Grayson Repowering Project

Mr. Krause and members of the Glendale City Council:

I am very strongly opposed to the Grayson Repowering Project as outlined in the September 2017 Draft EIR. 745-1

Our community, our society and our world need government and industry to develop solutions that are environmentally sustainable, non-polluting, and resilient. 745-2

The City of Glendale should thoroughly develop "outside-of-the-plant" ideas for replacing its aging power generation equipment, end its consulting agreement with Stantec, and commission an independent study of clean energy alternatives by a group such as NREL or E3 with strong clean energy credentials. 745-3

For the huge amount of money proposed for the Grayson Repowering Project, Glendale should instead be designing and installing a model project for the 21st century that will inspire the community, draw high-tech business interest, and lead other utilities to consider new business models. 745-4

Sincerely,

Brenda Laue
Glendale Resident
1423 Idlewood Road

746

Krause, Erik

From: Brie Shaffer <brieshaffer@gmail.com>
Sent: Sunday, November 19, 2017 2:39 PM
To: Krause, Erik
Subject: Grayson power plant oppose

Dear Mr Krause,
I am a homeowner in Atwater and my business manager is in Glendale. I strongly oppose the expansion of the Grayson power plant and hope that you and other city officials will shut this proposed expansion down immediately. 746-1
Kind regards,
Brie Shaffer

747

Krause, Erik

From: Krause, Erik
Sent: Wednesday, November 22, 2017 9:49 AM
To: StephAnnie Roberts; Michael.Weber@stantec.com; van Muyden, Gillian; Godinez, Christine
Subject: Fwd: Grayson EIR - Conflicts of Interest (correction in bold)

Sent from my iPhone

Begin forwarded message:

From: Burt Culver <ballast@gmail.com>
Date: November 19, 2017 at 11:26:30 PM MST
To: ekrause@glendaleca.gov
Cc: vgharpetian@glendaleca.gov, "Devine, Paula" <pdevine@glendaleca.gov>, vagajanian@glendaleca.gov, zsinanyan@glendaleca.gov, anajarian@glendaleca.gov
Subject: Grayson EIR - Conflicts of Interest (correction in bold)

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 747-1

Many of the parties involved in this process have direct conflicts of interest that need to be pointed out. It seems that these conflicts of interest should disqualify these companies from participating in the CEQA process.

The City of Glendale has contracted with Pace Global, a wholly-owned subsidiary of Siemens for the IRP and with Stantec for the post-IRP phase of the project. 747-2

Siemens sells natural gas turbines and other fossil fuel based electrical generation equipment and is subsequently not a neutral party for drafting an IRP. They have financial interest in Glendale choosing the largest natural gas generation facility that could qualify for SCAQMD approval. The largest allowable natural gas facility was the outcome of their IRP.

Stantec was contracted on an hourly basis to manage the EIR process, SCAQMD approval, plant demolition, plant construction, and plant start-up. Therefore they have financial interest in doing the EIR in such a manner that other alternatives are not considered. It is in their own interest to inadequately explore alternatives, propose incomplete alternative projects that can be easily dismissed, and to analyse the project in the most favorable terms for the eventual construction of the plant as possible. 747-3

Glendale's public utility is not operating in the public's best interest when it hires companies with conflicts of interest to manage what should be open and fair evaluations environmentally responsible alternatives of providing electricity. 747-4

GWP's employees do a fantastic job keeping the lights on in Glendale. At the same time, there is a conflict of interest within the utility that could lead to an unconscious bias. GWP employees have a financial interest in the outcome of the project because employee salaries and benefits are paid out of the GWP operating budget. The more money available in the budget, the more money available for salaries and retirement benefits. Building the largest plant possible will enable GWP to generate and sell the most amount of electricity and have the most amount of money available for staff compensation. Similarly, selection of alternative projects that reduce peak demand would reduce the utility's income and could have consequences for staffing levels. Glendale should hire independent non-biased consultants to find the best alternative project that fits the communities needs for the environment and their energy needs. 747-5

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean 747-6

energy credentials and not by the consultants who have been working on the Grayson EIR.

Regards,

Burt Culver
Glendale

748

From: Burt Culver <ballast@gmail.com>
Date: November 19, 2017 at 11:26:30 PM MST
To: ekrause@glendaleca.gov
Cc: vgharpetian@glendaleca.gov, "Devine, Paula" <pdevine@glendaleca.gov>, vagajanian@glendaleca.gov, zsinanyan@glendaleca.gov, anajarian@glendaleca.gov
Subject: Grayson EIR - Conflicts of Interest (correction in bold)

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 748-1

Many of the parties involved in this process have direct conflicts of interest that need to be pointed out. It seems that these conflicts of interest should disqualify these companies from participating in the CEQA process.

The City of Glendale has contracted with Pace Global, a wholly-owned subsidiary of Siemens for the IRP and with Stantec for the post-IRP phase of the project. 748-2

Siemens sells natural gas turbines and other fossil fuel based electrical generation equipment and is subsequently not a neutral party for drafting an IRP. They have financial interest in Glendale choosing the largest natural gas generation facility that could qualify for SCAQMD approval. The largest allowable natural gas facility was the outcome of their IRP.

Stantec was contracted on an hourly basis to manage the EIR process, SCAQMD approval, plant demolition, plant construction, and plant start-up. Therefore they have financial interest in doing the EIR in such a manner that other alternatives are not considered. It is in their own interest to inadequately explore alternatives, propose incomplete alternative projects that can be easily dismissed, and to analyse the project in the most favorable terms for the eventual construction of the plant as possible. 748-3

Glendale's public utility is not operating in the public's best interest when it hires companies with conflicts of interest to manage what should be open and fair evaluations environmentally responsible alternatives of providing electricity. 748-4

GWP's employees do a fantastic job keeping the lights on in Glendale. At the same time, there is a conflict of interest within the utility that could lead to an unconscious bias. GWP employees have a financial interest in the outcome of the project because employee salaries and benefits are paid out of the GWP operating budget. The more money available in the budget, the more money available for salaries and retirement benefits. Building the largest plant possible will enable GWP to generate and sell the most amount of electricity and have the most amount of money available for staff compensation. Similarly, selection of alternative projects that reduce peak demand would reduce the utility's income and could have consequences for staffing levels. Glendale should hire independent non-biased consultants to find the best alternative project that fits the communities needs for the environment and their energy needs. 748-5

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 748-6

Regards,

Burt Culver
Glendale

749

Krause, Erik

From: Cassandra Barry <cassandrabarry@me.com>
Sent: Sunday, November 19, 2017 3:12 PM
To: Krause, Erik
Subject: Opposing Grayson expansion

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 749-1

My child attends elementary school in Glendale. 749-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 749-3

Regards,
Cassandra Barry

750

Krause, Erik

From: Earthjustice <action@earthjustice.org> on behalf of Catherine Molibs3 <info@earthjustice.org>
Sent: Sunday, November 19, 2017 9:38 PM
To: Krause, Erik
Subject: Please reject plants to rebuild the Grayson natural gas power plant

Nov 19, 2017

Deputy Director of Community Development Erik Krause

Dear Deputy Director of Community Development Krause,

We can afford a disaster. Don't go cheap, think of lives first.

As a Glendale resident, I'm writing to express my strong opposition to a new gas-fired power plant in our community. Please reject plans to rebuild the Grayson natural gas power plant in favor of clean energy alternatives. 750-1

Thousands of people live and work directly within the Grayson project's impact zone, which includes schools, daycare centers, homes for the elderly and offices. Glendale's air quality is already terrible--it's time to invest in an energy grid that can turn that around. 750-2

Furthermore, Glendale does not urgently need the power from this project. Even without Grayson, the city has enough energy to cover our daily needs most of the time. Our summertime spikes can be met with clean energy, just as other communities around California are doing.
The Grayson project leaves Glendale sitting on (and Glendale residents paying for) way more electricity than we need. 750-3

We have the means to power our city with renewable energy. Let's not tie ourselves to fossil fuel infrastructure that will harm our families and our checkbooks for decades. Cities across California are ditching fossil fuel power and we can too. It's time for Glendale to step into a clean air, clean energy future. 750-4

Sincerely,

Catherine Molibs3

Glendale, CA 91207
laxica56@gmail.com

751

Krause, Erik

From: Catherine Sarkissian Yesayan <cyesayan@gmail.com>
Sent: Sunday, November 19, 2017 5:28 PM
To: Krause, Erik
Subject: Grayson Re-opening

I am strongly opposed to the Grayson Re-powering Project as outlined in the September 2017 Draft EIR. The City of Glendale should thoroughly develop "outside-of-the-plant" ideas for replacing its aging power generation equipment, end its consulting agreement with Stantec, and commission an independent study of clean energy alternatives by a group such as NREL or E3 with strong clean energy credentials. 751-1

For the huge amount of money proposed for the Grayson Repowering Project, Glendale should instead be designing and installing a model project for the 21st century that will inspire the community, draw high-tech business interest, and lead other utilities to consider new business models. 751-2

Catherine Yesayan— 320 N Central Ave Glendale Ca 91206— forty years Glendale resident

752

Krause, Erik

From: Earthjustice <action@earthjustice.org> on behalf of Christine Brown <info@earthjustice.org>
Sent: Sunday, November 19, 2017 9:08 PM
To: Krause, Erik
Subject: Please reject plants to rebuild the Grayson natural gas power plant

Nov 19, 2017

Deputy Director of Community Development Erik Krause

Dear Deputy Director of Community Development Krause,

I do not want a plant here in Glendale unless it is alternative energy.
We are not going to ruin our beautiful town 752-1

As a Glendale resident, I'm writing to express my strong opposition to a new gas-fired power plant in our community. Please reject plans to rebuild the Grayson natural gas power plant in favor of clean energy alternatives. 752-2

Thousands of people live and work directly within the Grayson project's impact zone, which includes schools, daycare centers, homes for the elderly and offices. Glendale's air quality is already terrible--it's time to invest in an energy grid that can turn that around. 752-3

Furthermore, Glendale does not urgently need the power from this project. Even without Grayson, the city has enough energy to cover our daily needs most of the time. Our summertime spikes can be met with clean energy, just as other communities around California are doing.
The Grayson project leaves Glendale sitting on (and Glendale residents paying for) way more electricity than we need. 752-4

We have the means to power our city with renewable energy. Let's not tie ourselves to fossil fuel infrastructure that will harm our families and our checkbooks for decades. Cities across California are ditching fossil fuel power and we can too. It's time for Glendale to step into a clean air, clean energy future. 752-5

Sincerely,

Christine Brown

Glendale, CA 91202
gourmet52@aol.com

753

Krause, Erik

From: Corinne Buchanan <littlemono@sbcglobal.net>
Sent: Sunday, November 19, 2017 9:35 AM
To: Krause, Erik
Subject: Grayson repowering project

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 753-1

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 753-2

Regards,

Corinne Buchanan
Highland Park, CA

Sent from my iPhone

754

Krause, Erik

From: Courtney Smith Wiesmore <courtneywiesmore@gmail.com>
Sent: Sunday, November 19, 2017 1:04 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project. 754-1

As a local parent, it is already mind-boggling to think of how much pollution my children are exposed to on a daily basis. Additionally, several of us suffer from auto-immune diseases which are exacerbated by air and water pollution. 754-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 754-3

Regards,

Courtney Wiesmore
South Pasadena, CA
Atwater Village, CA

Courtney Wiesmore
courtneywiesmore@gmail.com

755

Krause, Erik

From: Courtney Stuart-Alban <courtneyalban@gmail.com>
Sent: Sunday, November 19, 2017 2:22 PM
To: Krause, Erik; Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: STOP GRAYSON POWER PLANT!!!!!!!!!!!!

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 755-1

My kids have been in school in Glendale since preschool and the air quality is bad enough already. They both already endure respiratory weaknesses attributable to pollution. Why is Glendale not moving towards a forward-thinking clean energy solution? Why is Glendale sacrificing the health of its residents in favor of dirty coal? Glendale should be a leader in clean energy not increase its pollution. 755-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 755-3

Regards,

Courtney Stuart-Alban
Glendale Mom

Krause, Erik

From: David Clark <dhclark1066@gmail.com>
Sent: Sunday, November 19, 2017 12:19 PM
To: ekrause@gledaleca.gov; Gharpetian, Vartan; Najarian, Ara; Devine, Paula; zsinanyan@glendale.gov; Agajanian, Vrej
Subject: Grayson Power Plant

To Glendale City Leaders

Decades ago, prior city leaders decided to build the Grayson Power Plant. At that time and in their perspective they made the right decision. This is born out by the fact that Grayson has provided the residents of Glendale with a reliable and independent source of energy for many years. Now that Grayson is near the end of its operational life, the current Glendale city leaders have a big decision to make. How does the City replace that lost power capacity? What is the correct solution for our current time and perspective? We need our leaders to lead us into the future to see the "big picture". In this case the big picture might well be a photograph of Earth taken from the Voyager space craft as it left the solar system. The earth caught in a sunbeam is a pale blue dot of 1 pixel. Carl Sagan said of the photograph, " From this perspective it reinforces the view that we should cherish and protect that blue dot for it is the only home that we have." I hope that you too will make a decision that will cherish and protect our future. Our children and grandchildren will surely thank you. 756-1

David and Melanie Clark
1407 Graynold Ave
Glendale, CA 91202

757

Krause, Erik

From: David Clark <dhclark1066@gmail.com>
Sent: Sunday, November 19, 2017 12:24 PM
To: Krause, Erik; Sinanyan, Zareh
Subject: Grayson Power Plant

To Glendale City Leaders

Decades ago, prior city leaders decided to build the Grayson Power Plant. At that time and in their perspective they made the right decision. This is born out by the fact that Grayson has provided the residents of Glendale with a reliable and independent source of energy for many years. Now that Grayson is near the end of its operational life, the current Glendale city leaders have a big decision to make. How does the City replace that lost power capacity? What is the correct solution for our current time and perspective? We need our leaders to lead us into the future to see the "big picture". In this case the big picture might well be a photograph of Earth taken from the Voyager space craft as it left the solar system. The earth caught in a sunbeam is a pale blue dot of 1 pixel. Carl Sagan said of the photograph, " From this perspective it reinforces the view that we should cherish and protect that blue dot for it is the only home that we have." I hope that you too will make a decision that will cherish and protect our future. Our children and grandchildren will surely thank you. 757-1

David and Melanie Clark
1407 Graynold Ave
Glendale, CA 91202

Sent from Mail for Windows 10

758

Krause, Erik

From: David Imai <david.imai@gmail.com>
Sent: Sunday, November 19, 2017 3:36 PM
To: Krause, Erik; Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson Power Plant

Dear Glendale City Council Members,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 758-1

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 758-2

Regards,

David Imai
Resident of Silver Lake

759

Krause, Erik

From: Dawn White <okaydawn@gmail.com>
Sent: Sunday, November 19, 2017 8:47 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 759-1

There is strong correlation between the location of power plants and cancer in children living in the region. I am the mother to a 9-month old living in the Glendale area and this terrifies me. 759-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 759-3

Regards,

Dawn White
Glassell Park Resident

760

Krause, Erik

From: Denise Larocque <larocque@earthlink.net>
Sent: Sunday, November 19, 2017 8:42 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 760-1

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 760-2

Regards,

Denise & Roger Larocque

761

Krause, Erik

From: Denise Walker <denisewalker3@yahoo.com>
Sent: Sunday, November 19, 2017 3:20 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Najarian, Ara; Devine, Paula; Sinanyan, Zareh; Agajanian, Vrej
Subject: Grayson Plant

I have lived in Glendale since 1971, and have seen a lot of changes. Some good, some bad. I want my voice heard considering your plan to rebuild and expand the gas-fired plant at the site of the old Grayson facility. Expanding Grayson will add more toxic emissions into the surrounding neighborhoods. Please research how much asthma has increased in our population. Ask the schools how many children need to get permission to bring inhalers to school. And that pales in comparison to the even more serious diseases known to be associated with fossil fuel. 761-1

It's time to get on board with finding greener avenues. Why add to our debt by expanding "yesterday's way of doing things". We have so many people, so many cars, and so many huge new apartment buildings in our city. You evidently feel "more is better" - fill every inch of our city to capacity. Well, we haven't been able to convince you otherwise on that subject, please consider this - stop the current review process and do what LADWP did - commission an independent study of *clean energy alternatives.* On average, California gets 27% of our electricity from renewable energy. Our state has an obligation to make that 50% by 2030. The new Grayson proposal will drag Glendale (and California) backward. 761-2

Let's be a leader, set an example, and let the L.A. Times write an article about the City of Glendale as a smart forward-looking city which is proactive in taking care of our population and environment. Don't tie us to debt for old fashion ways. Consider looking forward to the future way of green energy. It just makes sense! 761-3

Sincerely
Denise Walker

762

Krause, Erik

From: luvdharmakaya@gmail.com
Sent: Sunday, November 19, 2017 3:18 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 762-1

[Personalized text] – feel free to draw on your experience or any of the points in the talking points

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 762-2

Regards,

[Name] [City]

Sent from my iPhone

763

Krause, Erik

From: Media City School of Music <mediacitymusic@gmail.com>
Sent: Sunday, November 19, 2017 10:18 AM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson repowering project

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 763-1

I have a small music school that teaches many small children in the affected area. I also live here and have a child myself. There is an elementary school and many families, parks, bicycle paths and sports areas that will be affected as well. This is a terrible place to increase pollutants. Renewables have reached the point in their technology that it makes sense to move forward with cleaner options. 763-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 763-3

Diana Extein

Media City School of Music

818 839 0665
www.mediacityschool.com

764

Krause, Erik

From: diana matsushima <diana.matsushima@gmail.com>
Sent: Sunday, November 19, 2017 8:24 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 764-1

As you know the expansion will cost as much as $500 million that will become a binding financial obligation of the City of Glendale, i.e., its residents. 764-2

The City should pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. The study should analyze how solar and energy efficient in combination with other sources of power can meet the City's current and future needs. Our home and many others in the Verdugo Woodlands neighborhood are taking advantage of solar energy. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 764-3

Regards,

Diana S. Matsushima
Verdugo Woodlands, Glendale

765

Krause, Erik

From: Diana Menedjian <dmenedjian@icloud.com>
Sent: Sunday, November 19, 2017 11:58 AM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 765-1

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 765-2

Regards,

Diana Menedjian
Glendale CA

Sent from my iPhone

766

Krause, Erik

From: Pliofilm <pliofilm@aol.com>
Sent: Sunday, November 19, 2017 10:46 AM
To: Krause, Erik; Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Opposition to the Grayson repowering project

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 766-1

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 766-2

Regards,

Diane Zurn
3900 Toland Way
90065

{ a horse made by committee ends up being a cow }

767

Krause, Erik

From: dianna jaynes <djaynes@sbcglobal.net>
Sent: Sunday, November 19, 2017 8:58 PM
To: Krause, Erik; Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: please read- residents' concerns....

Hello,

Please read.

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 767-1

OUR CHILDREN LIVE HERE. THIS IS UNCONSCIONABLE. 767-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 767-3

Regards,
Dianna Jaynes, Eagle Rock

768

Krause, Erik

From: Donna Mackie <donnamdome@gmail.com>
Sent: Sunday, November 19, 2017 2:41 PM
To: Krause, Erik; vagajanian@glendale.gov; vgharpetian@glendale.gov
Subject: Polluting power plant

VOTE NO!! Save the air. VOTE NO!! 768-1

769

Krause, Erik

From: Doug Jung <djung001@sbcglobal.net>
Sent: Sunday, November 19, 2017 4:01 PM
To: Krause, Erik
Subject: Grayson Power Plant

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 769-1

Our children have attended school in Glendale for the past 5 years with plans to continue schooling for another 3 years. 769-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 769-3

Regards,

Doug Jung
Los Angles, CA

Sent from my iPhone

770

Krause, Erik

From: Edwin Vartany (edwinvartany@yahoo.com) Sent You a Personal Message <automail@knowwho.com>
Sent: Sunday, November 19, 2017 10:52 PM
To: Krause, Erik
Subject: Grayson Power Plant: Go Away

Dear Mr. Erik Krause,

As a resident of Glendale and a GWP customer, I'm writing to voice my strong opposition to rebuilding and expanding the Grayson Power Plant. Rather than sinking $500 million into a polluting fossil fuel facility, I urge you to seize the opportunity to make Glendale a showcase for clean energy alternatives. The list of concerns with this project is long. 770-1

? Emissions of carbon monoxide, nitrogen dioxide, sulfur dioxide, small particulate matter and other pollutants will increase across the board. This will worsen already bad air quality in an area that houses two elementary schools (Mark Keppel and Franklin), the Disney Creative Campus and Disney Children's Center, the residential neighborhoods of Pelanconi Estates and Moorpark, and popular outdoor spaces such as the John Ferraro Athletic Fields and Glendale Narrows Riverwalk. 770-2

? Greenhouse gas emissions, which are heating up our region and increasing risks of drought and fire, will increase by more than 415,000 tons of carbon dioxide each year. That's an increase of six times over the current levels, and equivalent to adding 90,000 cars to Glendale's roads! 770-3

? The plant would be built in an identified liquefaction zone. That makes the plant itself, and the gas piping and transmission systems, all highly vulnerable to a serious earthquake. Apart from the obvious safety risks, this raises questions about its ability to maintain reliable service in an emergency. 770-4

? Spending $500 million on a single, large fossil fuel plant creates huge financial risks for Glendale ratepayers. With efforts underway in Sacramento to move the state to 100% clean energy by 2045, it's more likely than not that we'll be paying for this plant long after it's been forced to shut down. 770-5

Glendale doesn't even need this much power. Your own reports forecast falling demand for electricity in Glendale. If demand is falling, why would we need to build a plant that increases generating capacity by 33% as this proposal does? 770-6

This project would lock us into legacy technology that harms public health just at a time when the rest of the state is surging forward. I urge you to halt efforts to expand Grayson and commission a study of clean energy alternatives. 770-7

Sincerely,

Edwin Vartany
530 w stocker st #106
Glendale, CA 91202
edwinvartany@yahoo.com
(747) 228-5406

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.

771

Krause, Erik

From: Erik P. <erikp3000@gmail.com>
Sent: Sunday, November 19, 2017 4:16 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 771-1

Please, we as parents beg you to stop this development. 771-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 771-3

Regards,

Erik Paparozzi
90027

772

Krause, Erik

From: Earthjustice <action@earthjustice.org> on behalf of Evan Cloninger <info@earthjustice.org>
Sent: Sunday, November 19, 2017 11:37 AM
To: Krause, Erik
Subject: Please reject plants to rebuild the Grayson natural gas power plant

Nov 19, 2017

Deputy Director of Community Development Erik Krause

Dear Deputy Director of Community Development Krause,

Thank you for reading my letter.

As a Glendale resident, I'm writing to express my strong opposition to a new gas-fired power plant in our community. Please reject plans to rebuild the Grayson natural gas power plant in favor of clean energy alternatives. 772-1

Thousands of people live and work directly within the Grayson project's impact zone, which includes schools, daycare centers, homes for the elderly and offices. Glendale's air quality is already terrible--it's time to invest in an energy grid that can turn that around. 772-2

Furthermore, Glendale does not urgently need the power from this project. Even without Grayson, the city has enough energy to cover our daily needs most of the time. Our summertime spikes can be met with clean energy, just as other communities around California are doing.
The Grayson project leaves Glendale sitting on (and Glendale residents paying for) way more electricity than we need. 772-3

We have the means to power our city with renewable energy. Let's not tie ourselves to fossil fuel infrastructure that will harm our families and our checkbooks for decades. Cities across California are ditching fossil fuel power and we can too. It's time for Glendale to step into a clean air, clean energy future. 772-4

Sincerely,

Evan Cloninger

Glendale, CA 91205
univox412@yahoo.com

773

Krause, Erik

From: Eve Luckring <eluckring@yahoo.com>
Sent: Sunday, November 19, 2017 8:24 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: our air quality

Dear Mr. Krause, I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 773-1

At a time when clean alternatives are available we shouldbe investing in them, not doubling down on last century's dirty power 773-2

There are schools, daycares, neighborhoods, and workplaces within 1000 feet of this plant. Any additional cancer, asthma, heart disease risk is unacceptable. 773-3

The City of Glendale should pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 773-4

Thank You,
Eve Luckring
3641 Lavell Drive
Los Angeles, CA 90065

774

Krause, Erik

From: Evelyne Werzowa <ewerzowa@me.com>
Sent: Sunday, November 19, 2017 9:00 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 774-1

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 774-2

Regards,

Evelyne Werzowa , Los Angeles CA 90068

775

Krause, Erik

From: Flor Monroy <flmonroy09@outlook.com>
Sent: Sunday, November 19, 2017 7:55 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 775-1

Im a resident in Glendale I'm 1 mile away from the plant. I am very concern. I don't think this is a good idea. 775-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 775-3

Regards,

Flor Monroy, Glendale, CA

Sent from my iPhone

776

Krause, Erik

From: P Harris <harrisp0@msn.com>
Sent: Sunday, November 19, 2017 11:32 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 draft EIR 776-1

Fossil fuels is a thing of the past. It lives underground let it stay underneath the ground to HELP HEAL the already torn landscape we live in. It IS thoughtful, and sensible to spend taxpayers money investing on using the elements of the sun/wind/water. Children and our aging parents are our responsibility for their health and wellbeing as we are to ourselves and to achieve a wholesome wellness is breathing pristine breathable air.
You, Grayson don't want to be the cause of illnesses due to toxic air. 776-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 776-3

Regards,
Flordeliza A Harris
Los Angeles

Sent from my iPhone

777

Krause, Erik

From: Francesca Smith <smith-zzz@sbcglobal.net>
Sent: Sunday, November 19, 2017 1:21 PM
To: Krause, Erik
Cc: Platt, Jay; Greg Grammer; Catherine Jurca
Subject: Grayson Power Plant Repowering Project Draft Environment Impact Report
Attachments: Letter on Stationery- Grayson Power Plant EIR-FINAL.pdf

On behalf of The Glendale Historical Society, please find our comment letter on the Grayson Power Plant Repowering Project Draft Environment Impact Report attached as a pdf file. We look forward to being involved in the process as the project review moves forward. 777-1

Thanks,
Francesca Smith
TGHS, Board of Directors

THE GLENDALE HISTORICAL SOCIETY
CONSERVING OUR HERITAGE

P.O. Box 4173 Glendale CA 91202
www.GlendaleHistorical.org

November 19, 2017

Mr. Erik Krause
Interim Deputy Director of Community Development
City of Glendale Community Development Department
633 E Broadway, Room 103
Glendale CA 91206

RE: Comments on Proposed Grayson Repowering Project Draft Environmental Impact Statement

Dear Mr. Krause:

On behalf of the Board of Directors of The Glendale Historical Society (TGHS), I would like to thank you for the opportunity to comment on the draft Environmental Impact Report (DEIR) for the Proposed Grayson Repowering Project. Established in 1979, TGHS is a non-profit organization with more than 700 members dedicated to the preservation of Glendale's history and architectural heritage through advocacy and education.

We disagree with the findings that the Grayson Steam Electric Power Plant is not a historical resource as defined in CEQA. We believe that the consultant's assessment of historic significance is fundamentally flawed. TGHS believes that the Grayson Steam Electric Power Plant may be eligible for listing in the National Register and that it is eligible for listing in the California and Glendale Registers for its associative as well as for its design and engineering significance. We also believe the DEIR is flawed in other important ways described in detail below.

Tribal Cultural Resources

We note that the "Tribal Cultural Resources" chapter of the DEIR is incorrectly titled. This inaccuracy demonstrates a lack of basic understanding of the intent of the section and the task by preparers. The purpose of what is normally called a Cultural Resources chapter in an EIR is to identify and evaluate the potential for a project to affect paleontological, archaeological and historical resources. Resources of concern include fossils, prehistoric and historic artifacts, burials, sites of religious or cultural significance to Native American groups, and historical resources.

The Glendale Historical Society (TGHS) advocates for the preservation of important Glendale landmarks, supports maintaining the historic character of Glendale's neighborhoods, educates the public about and engages the community in celebrating and preserving Glendale's history and architectural heritage, and operates the Doctors House Museum. TGHS is a tax-exempt, not-for-profit 501(c)(3) organization, and donations to TGHS are tax-deductible to the extent permitted by law.

Its essential questions should be:

> Is there a historical resource that may be affected by the proposed project; and
>
> Will the project result in a substantial adverse change to the extent that the resource's historical value is materially impaired or lost?

Evaluations for historic significance are not normally "negative" as stated in the document; historical resources either exist or they do not. Negative findings are an archaic term that was used in solely archaeological investigations and do not apply to the built environment. That paragraph, along with the section title, the evaluation and analysis contained therein, alerts informed readers to the fact that the entire section may have been prepared primarily by archaeologists practicing outside of their fields of expertise.

The Tribal Cultural Resources title implies that only archaeological resources and tribal concerns were considered. Under CEQA, Initial Studies and EIRs address Cultural Resources, not merely "Tribal Cultural Resources."

Preparer Qualifications

The preparer qualifications presented in the Initial Study (1.4 Cultural Resources Project Staff Qualifications) do not demonstrate that any staff meet the Secretary of the Interior's Professional Qualifications Standards. A statement in the closing paragraph claims "The Stantec Cultural Resources *Program Manager* and *Senior Architectural Historians* directing the survey meet the Professional Qualification Standards of the Department of the Interior" but provides no particulars regarding degrees attained and more importantly does not identify any staff members' fields of expertise (emphasis added). Each provides numbers of years preparing reports, but none of the brief biographies provides evidence to corroborate meeting the Secretary of the Interior's Professional Qualifications Standards codified in CFR Part 61.

The guidance in Archeology And Historic Preservation: Secretary of the Interior's Standards and Guidelines [as Amended and Annotated] directs "The qualifications define minimum education and experience required to perform identification, evaluation, registration, and treatment activities. In some cases, additional areas or levels of expertise may be needed, depending on the complexity of the task and the nature of the historic properties involved." The website for the Historical Architect responsible for the report states that he specializes "in custom residential architecture, and also do[es] commercial projects" (http://www.johnterryarch.com/Introduction-1). Enumerated experience on that website includes two "renovations" but no rehabilitations or restorations are listed. No evidence of a year or more of graduate study or of professional experience including "detailed investigations of historic structures, preparation of historic structures research reports, and preparation of plans and specifications for preservation projects" as cited in the Professional Qualifications Standards is provided. We submit that this evaluation for historic significance is a complex case, and that the preparers provide no evidence of additional levels or areas of expertise and show no demonstrated experience with successful evaluations for the National, California, or Glendale Registers.

Archaeologists are not normally qualified to prepare built environment evaluations, and historians are not interchangeable with historic architects. In the FEIR revised cultural resources technical report all preparers' professional qualifications should be clearly stated, otherwise the reviewers suspect that it was prepared by staff who have generated reports for specific numbers

of years rather than persons with demonstrated expertise necessary to perform the tasks required for this evaluation of historic significance and analysis of effects.

Laws, Ordinances, Regulations and Standards

The introductory "Laws, Ordinances, Regulations and Standards (LORS)" section is fatally flawed. The applying LORS enumerated are not demonstrated to have any specific application to the project. If federal regulations apply to the proposed project, then Section 106 of the National Historic Preservation Act (as amended) would pertain to the project. If the project has *any* federal nexus, the proper environmental document would likely be an Environmental Impact Statement/Environmental Impact Report (EIS/EIR) rather than merely an EIR.

It is not clear that Section 106 of the National Historic Preservation Act does or does not apply to the proposed project. We expect that a project of this type requires federal permits, licenses or other approvals. If so, Section 106 applies and the appropriate clearance document may be an Environmental Impact Study and well as an Environmental Impact Report.

The federal Environmental Protection Agency (EPA) promulgated the Steam Electric Power Generating Effluent Guidelines and Standards (40 CFR Part 423) in 1974, and amended the regulations in 1977, 1978, 1980, 1982 and 2015. *The regulations cover wastewater discharges from power plants operating as utilities.* The steam electric regulations are incorporated into National Pollutant Discharge Elimination System (NPDES) permits. If a NPDES permit or any other federal approval or license is required for the proposed project, *there is a federal nexus and Section 106 applies.*

Further, the EPA released a final rule to limit greenhouse gas emissions from new power plants on August 3, 2015. The final "Carbon Pollution Standard for New Power Plants" establishes New Source Performance Standards to limit emissions of carbon dioxide from fossil fuel-fired power plants. If the "Carbon Pollution Standard for New Power Plants" applies to the proposed project or any other federal approval or license is required for the proposed project, *there is a federal nexus and Section 106 applies.*

Please explain how the National Environmental Policy Act would or would not apply to the proposed project. Can the proposed project be considered a major federal action that would be determined to significantly affect the quality of the human environment?

The "Applicable Federal, State, Local LORS for Tribal [*sic*] Cultural Resources" table and section notably contains no discussion of whether or not the listed LORS apply and why, which is an obvious necessity in such documents. Merely listing the language in LORS does not inform the public or decision-makers in making their decisions regarding the proposed project.

In the "Applicable Federal, State, Local LORS for Tribal Cultural Resources" table, there are significant errors and omissions. The administering agency column is incorrect *in each entry.* For instance, Section 106 is not administered by the Code of Federal Regulations (CFR). CFR is not and has never been an administering agency; it is codification of the general and permanent rules and regulations (or administrative law) published in the Federal Register by the executive departments and agencies of the federal government. Applicable Federal Agency Programs administer Section 106 with the Advisory Council on Historic Preservation. If that table, which provides no information of value to the analysis, remains, it must be corrected in the Final EIR or a supplemental EIS/EIR. We strongly recommend that it be completed (most of it is blank) and corrected to list correct administering agencies.

Further, where each of the LORS is enumerated in the narrative sections below, applicable language was merely cut-and-pasted into the document. There is notably no description of how the listed LORS apply to the proposed project, and why, or what it means to the project or analysis, which is critical to understanding what the document is and why preparers came to whatever conclusions they did. Absent this information, the "Tribal Cultural Resources" section of the document is useless, devoid of worthwhile information for decision makers and the public. Reviewers are left wondering what laws, ordinances, and regulations apply to the proposed project, why and how that fits into the analysis at hand.

Archaeology

Neither the "Existing Conditions" section nor the other parts of the larger "Tribal Cultural Resources" chapter make reference to any archaeological surveys being performed, presenting the property only above-ground when whatever does or does not exist below grade is undeniably part of the subject property's cultural resources existing conditions. No reference was made to any archaeological surveys being performed for the proposed project, to the likelihood of encountering archaeological resources, or to what the expected impacts of effects would be on those resources.

Review of the Initial Study, where the technical reports are sequestered, provides an overview of archaeological surveys being performed in 2003 and 2016, providing no further details. What methods were used? How much of the subject property was surveyed? More importantly, who at the City of Glendale has the appropriate credentials (meeting the Secretary of the Interior's Professional Qualifications Standards in Archaeology) to critically review the reports that ostensibly resulted? Was a subcontractor engaged to review whatever reports resulted from those surveys? Please provide the name and professional qualifications of the archaeologist who reviewed the confidential section of the Initial Study for the City.

Methodology

The "Methodology" section of the EIR is inadequate as well. The two sentences describing Senate Bill 52 efforts is not equivalent to what should be a description of how project Cultural Resources procedures were carried out. Inserting words that do not apply into a section does not satisfy the requirements of CEQA. The methodology section is intended to explain how the evaluation and analysis were prepared that lead the preparers to arrive at the conclusions they did.

Evaluation for Historic Significance

We additionally submit that because the evaluation of the subject property's historic significance is not included in the document or the appended technical reports, decision makers cannot review the evaluation. Because of that omission, decision-makers and the public cannot make their own conclusions based on information presented as to whether or not the Grayson Steam-Electric Power Plant is historically significant. Thus decision-makers and the public are not able to judge whether substantial adverse change to a historical resources would be materially impaired or entirely lost. The California Code of Regulations (CCR) directs under Technical Detail:

> The information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. *Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through* <u>*inclusion of supporting information and analyses as*</u>

> *appendices to the main body of the EIR.* Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review (emphasis added, CCR Section 15147).

The applicable cultural resources analysis is not contained in the technical report section, or in an appendix, but was secreted in the Notice of Preparation. Once TGHS was able to locate the "Architectural Resource Evaluation of The Grayson Power Plant For City of Glendale, California" it was reviewed for adequacy by a professional qualified under the Secretary of the Interior's Qualifications Standards in both history and architectural history and was found not to be correct in its conclusions.

Other EIR reviewers will not know where to find the evaluation for historic significance. Because that analysis is not "readily available for public examination" it does not "assist in public review" as required. We strongly stress that the conclusion that the Grayson Steam-Electric Power is not historically significant was made in error and that the revised, corrected evaluation should be a technical appendix to the FEIR and that the FEIR should address alternatives to the project that would retain the historical resource and/or mitigate its loss if it were proven not to be feasible, based on facts.

The evaluation failed to consider the power plant as a contributor to a larger, previously unevaluated historic district as well, which is a fundamental component in any such survey.

Like the archaeological investigation, no evidence is provided of any lead agency review of the conclusions in the report being performed by qualified staff or consultants for the City of Glendale. The conclusions in the EIR that are based on incorrect finding in the Initial Study must be peer-reviewed for accuracy by professionally qualified professionals with demonstrated expertise in the applicable fields.

Reconnaissance Survey

The evaluators note in the survey type on the DPR form that the evaluation is an "Architectural Inventory and Evaluation *Reconnaissance* Survey." We strongly assert that an intensive evaluation must be prepared by local qualified architectural historians who have clear understanding of the Grayson Steam-Electric Power Plant's place in local and regional history and who have demonstrated experience in applying the criteria for Glendale Register of Historic Resources to evaluations for significance. We assert that the property's National, California Register and local significance were not properly considered and that its conclusions are incorrect.

National Register guidance prepared by the Department of the Interior provides a definition in "Guidelines for Local Surveys A Basis For Preservation Planning: "*Reconnaissance* may be thought of as a 'once over lightly' inspection of an area, most useful for characterizing its resources in general and for developing a basis for deciding how to organize and orient more detailed survey efforts."

Likewise directions in "The Secretary of the Interior's Guidelines for Identification" state

> Reconnaissance survey might be most profitably employed when gathering data to refine a developed historic context—such as checking on the presence or absence of expected property types, to define specific property types or to estimate the distribution of historic properties in an area… *In most cases, areas surveyed in this way will require resurvey if*

> *more complete information is needed about specific properties*" (emphasis added, Archaeology and Historic Preservation: Secretary of The Interior's Standards and Guidelines, as Amended and Annotated, 48 Federal Register 44716, effective 1983).

We believe a reconnaissance survey, buried in the Initial Study was not the correct level of evaluation, which should rightly be an intensive survey in a technical appendix to the EIR that would allow reviewers the opportunity to consider the logic of a full evaluation for historic significance.

Is the Grayson Steam-Electric Plant a Historical Resource?

The "Tribal Cultural Resources" [*sic*] EIR section commences with a statement where the authors refute their own justification for finding the Grayson Steam-Electric Power not to be historically significant:

> While the [Grayson Steam-Electric Power] Plant does possess potential significance under the… [California Register] and Glendale Register of Historic Resources Criterions [*sic*] 1, 2, 3, and 4, a lack of integrity under all aspects of integrity recognized by the… [California Register], and implemented for the City of Glendale Register… *which is silent on aspects of integrity*, undermines the property's ability to convey importance/significance for either the state or local registers.

The Glendale Register has no requirement for integrity. Finding a property not eligible for the Glendale Register because of supposed alterations is not supported in the stated requirements for designation on the local register. Because the Glendale Register has no specific requirements for integrity a property's significance should not be dismissed because of alterations, particularly when the facility being evaluated remains absolutely recognizable to its original appearance.

When properties are significant for associations with the development of the community or with important persons they need not retain the same aspects or level of integrity as a property that is significant only for its design. That concept is a fundamental principle in evaluating properties for historic significance and was markedly not recognized by the document preparers. Furthermore, the addition of separate cooling towers, maintenance and storage buildings, oil tanks and trailers over time would be essential to its continued use as a power plant and would be well-known to qualified, experienced practitioners.

The inadequate evaluation in the Initial Study does not make clear where the described, overly emphasized alterations are, or how they would collectively reduce the property's integrity of design. Table 4 in the Initial Study curiously lists more than 57 building permits (only post 1964), but after review, it is discovered that few, if any are actual alterations to the Grayson Steam-Electric Power Plant that would affect its integrity. The document states "Some of the projects associated with these permits are visible in the aerials…" but no connection between listed building permits and actual alterations that would affect the ability of the property to convey its significance, which is central to the claim of the property not being eligible, has been made.

Supposed alterations such as "Constructed a new concrete block chemical pump house with concrete roof" (1964), "Constructed one metal shed" (1970) and "Constructed a foundation (only) for a temporary modular trailer" (2012) demonstrate the consultant's lack of

understanding of the crux of an evaluation for historic significance. Does the property have historic significance and if it does, is it recognizable, depending on the type of significance?

None of those predominately separate actions described as alterations in the Initial Study table or annotated aerials affected the design, location, materials, workmanship, feeling or association of the power plant. Its setting may have changed since it was completed, but its setting in an industrial yard is not as essential to its significance as would the setting of other buildings such as a barn in an open field or adjacent to a barnyard. The subject property remains in a utility yard setting as it has been historically. The additional small buildings and other structures and objects that have been added to the subject property are located on the northwest and southwest, non-character-defining, secondary and rear sides of the plant as demonstrated in Figure 1.

Figure 1 makes evident the fact that there are no alterations on the façade or northeast side, none are shown on the southeast end wall (a carport was added sometime after 1950 that does not affect its integrity), various small additions on the non-character-defining southwest side and only a ramp was added on the northwest side.[1] Further text will describe why other small changes do not affect its integrity. The building's principal cladding materials remain, its original ribbon, hopper-type and glass block multi-story windows remain, the original metal sign on stand-outs and the distinctive, staggered, horizontal corner fillets remain intact. An experienced architectural historian would have exercised appropriate professional judgment and omitted items that were not alterations that affected the actual resource under consideration. The Grayson Steam-Electric Power Plant structure retains more than adequate integrity to its original design by Daniel A. Elliott, AIA, and remains recognizable.

[1] An "addition to boiler room" at the southwest corner is noted in the Initial Study Figure 15 annotated aerial photographs incorrectly as being added around 1979 (Aerial 4). That small addition is clearly evident in Aerial 2, the 1964 aerial photograph.

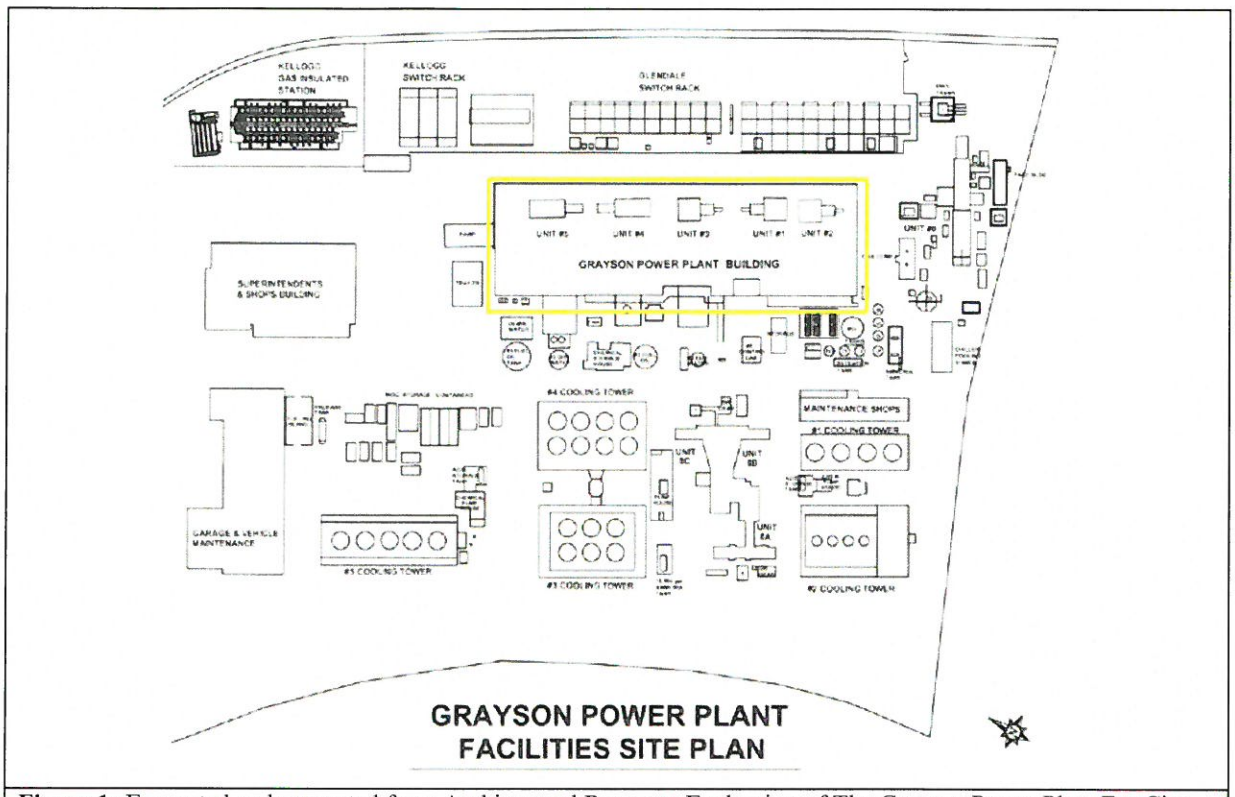

Figure 1: Excerpted and annotated from Architectural Resource Evaluation of The Grayson Power Plant For City of Glendale, California, showing only a ramp and trailer on the northwest (left-hand) side of the main building and various additional facilities at the back or southwest side of the Grayson Steam-Power Plant Building. Note that very few alterations in this figure are connected to the main, Grayson Steam-Power Plant Building, which is highlighted in yellow.

Grayson Steam-Electric Power Plant Significance

The Grayson Steam-Electric Power Plant is significant for its association with the development of the community, for its direct association with Lauren W. Grayson, likely for its Stripped Classicism design, as the work of a master architect, and as the first earthquake-proof power plant. Its integrity of design remains, clearly visible from all but one nearby street, the large, metal and stucco-clad building is visible, and the inventive, original design remains easily distinguishable.

Association with the Development of the Community

The power plant's connection to the development of Glendale is reasonably straightforward and is undeniable. Almost immediately after Glendale's incorporation, locals recognized the importance and costs savings of establishing independent utilities. Once street lighting became an issue, the new city government took action to establish a "light and power" entity, holding a bond election to acquire and construct an electric works system for the city by 1909 (Winston W. Crouch and Beatrice Dinerman, *Southern California Metropolis: A Study of Development of a Government for a Metropolitan Area*, 1964). An expanded distribution service and the establishment of the Glendale Light and Power Company were part of the consequences of that election. Without the existence of the subject property power plant, the community would not have had the necessary utility capacity to grow as it did after the second World War. In 1938,

the *Los Angeles Times* substantiated the assertion that the power plant made development of the community possible, reporting "City officials have maintained steadily that there are no available sources of power and that erection of the generating plant is necessary" ("City Officials Deny Charges in Glendale Power Plant Plan" 26 May 1938:14). The resulting power plant was built at an estimated cost of $1.5 million.

In the two decades spanning its construction, the population of modern Glendale increased by more than 50 percent between 1930 and 1950, from approximately 63,000 to 96,000 (U.S. Census). Neighboring Pasadena and other comparable communities' populations did not grow by nearly as great a percentage as Glendale's unfettered growth during that period. The stratospheric evolution of Glendale as a population and business center was spurred partly by annexation but as much by its increased ability to independently provide inexpensive power to newly expanding and establishing businesses and the thousands of new homes and apartments that were built during that time. That tendency continued "between 1980 and 2000, Glendale grew significantly more than neighboring areas" (City of Glendale, Government Departments, Economic Development, "Great Demographics," "Top 10 Reasons You Want Your Business in Glendale" at http://www.glendaleca.gov/government/departments/glendale-economic-development-corporation-/top-10-reasons-you-want-your-business-in-glendale/analytic-information). Sustaining that trend that was made partly possible by the existence of an independent power source, the population of Glendale soared by nearly 40 percent during that 20-year period, significantly more than any other single city in Los Angeles County and more than the county itself. Without an autonomous power source providing economical electricity, the unbridled population growth and expansion of Glendale after World War II would not have been possible. The power plant shaped that development rather than merely reflecting it. Because of that direct connection between Glendale's growth and the Grayson Steam-Electric Power Plant, it is eligible for listing in the California and Glendale Register under each Criterion 1 for its essential role making the postwar development of the community possible.

Distinctive Stripped Classicism Design, Work of a Master, and Engineering Significance

Stripped Classicism was a twentieth century architectural style that reduced all, or nearly all superfluous ornamentation. It was favored primarily by government agencies for public building designs and was widely used by the Works Progress Administration during the Depression. The style embraced simplified but recognizable classicism in its overall massing, scale and proportions while eliminating traditional decorative detailing.

The significance of the restrained design by architect Daniel Anthony Elliot, A.I.A. for the main building remains plainly visible and recognizable, but it is not adequately explored in the reconnaissance level evaluation. The original, remaining design placed a large amount of equipment inside a metal-clad, deftly stepped shell that articulated a large volume from what could have been an ungainly multi-street block shape into human-scaled units, reducing its apparent mass and creating an elegant solution to what could well be an entirely utilitarian facility. In addition the electrical turbines, which are entirely functional apparatuses used to drive generators to transform mechanical energy into electrical energy by electromagnetic induction, are cloaked in cleverly designed covers that supplement the large scale Stripped Classicism design elements of the facility into smaller units. At least three pencil-drawn renderings were made to demonstrate design alternatives that would camouflage the practical features.

It would be helpful to reviewers to understand the architect's remarkable career. Elliott was a designer for Gilbert Stanley Underwood, a recognized master architect, between the years 1925 and 1932, was a contributor to the Colorado Aqueduct Project (1932-'41), and was responsible for the designs of various other water and power plants (see "Experience Record," Daniel A. Elliott, AIA, Architect at http://dbase1.lapl.org/webpics/calindex/documents/04/515676.pdf). Elliott designed the Burbank Water & Power Building (1949, 164 W. Magnolia Bl, Burbank) which is a noted example of Late Moderne design, as illustrated by the Los Angeles Conservancy on its website (Explore LA, Historic Places <https://www.laconservancy.org/locations/burbank-water-and-power>). His utility portfolio was described in the "Public Imagery and Its Uses" section of *Los Angeles In the Thirties: 1931-1941,* which is considered an expert source on local architecture during that period (Gebhard and Von Bretton 1989).

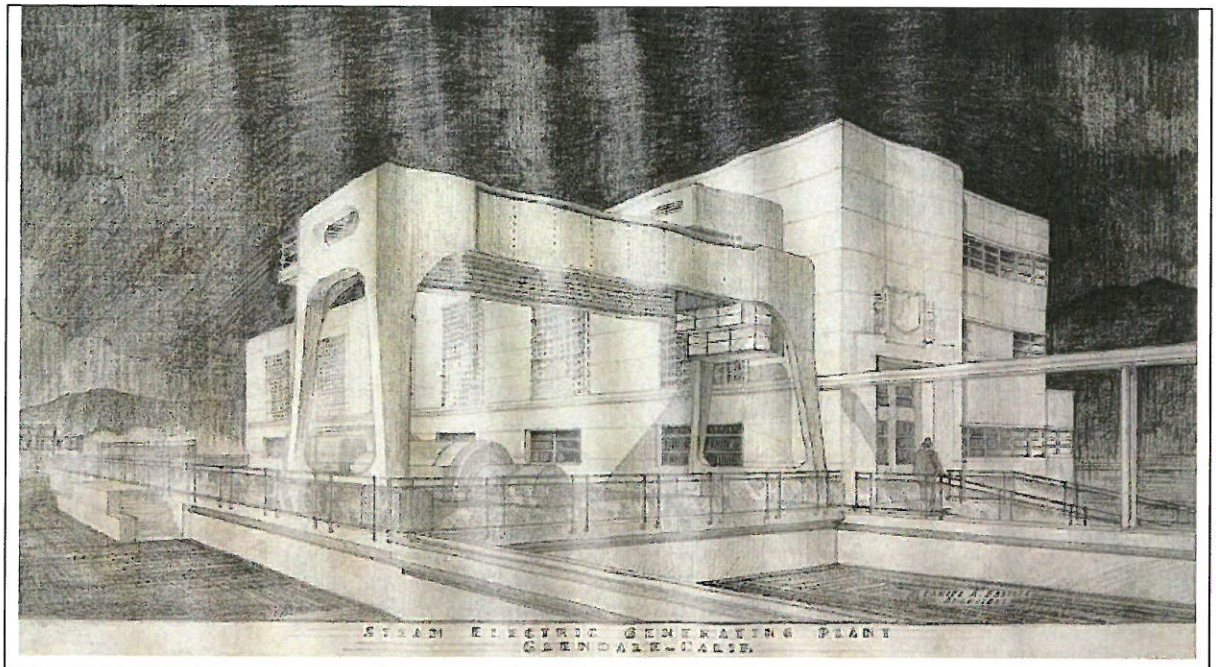

Figure 2: Pencil rendering of Glendale "Steam Electric Generating Plant" by Daniel A. Elliott, AIA excerpted from Initial Study, Architectural Resource Evaluation of The Grayson Power Plant For City of Glendale, California, Figure 9 (page 4.5). Compare with the recent photograph in Figure 3 that shows a series of multi-story, glass block windows in the boiler building portion of the Grayson Steam-Electric Power Plant building. If the crane in the foreground was at the south rather than the north end, the rendering and the power plant as it exists today would appear nearly the same, clearly expressing its distinctive Stripped Classicism design. The design treatment for the endwall in the above rendering was ultimately executed without the cartouche or the inset entrance. It is mistakenly called an "architectural drawing" rather than a rendering in the Initial Study.

The still-recognizable, Stripped Classicism design of the Grayson Steam-Electric Power Plant is understated, exquisitely proportioned, and was undeniably futuristic for its time. The three staggered, green horizontal strokes that wrap around the southeast corner skillfully punctuate the otherwise staid building composition and assert the Modernism of the design. At the north façade, left-justified bronze letters on stand-outs primly identify the facility: "City of Glendale Public Service Department Steam Electric Generating Plant." Most power plans in the 1930s and

now have no architectural design, reducing their aesthetic effects on the community, which is part of the significance of the Grayson Steam-Electric Power Plant's design.

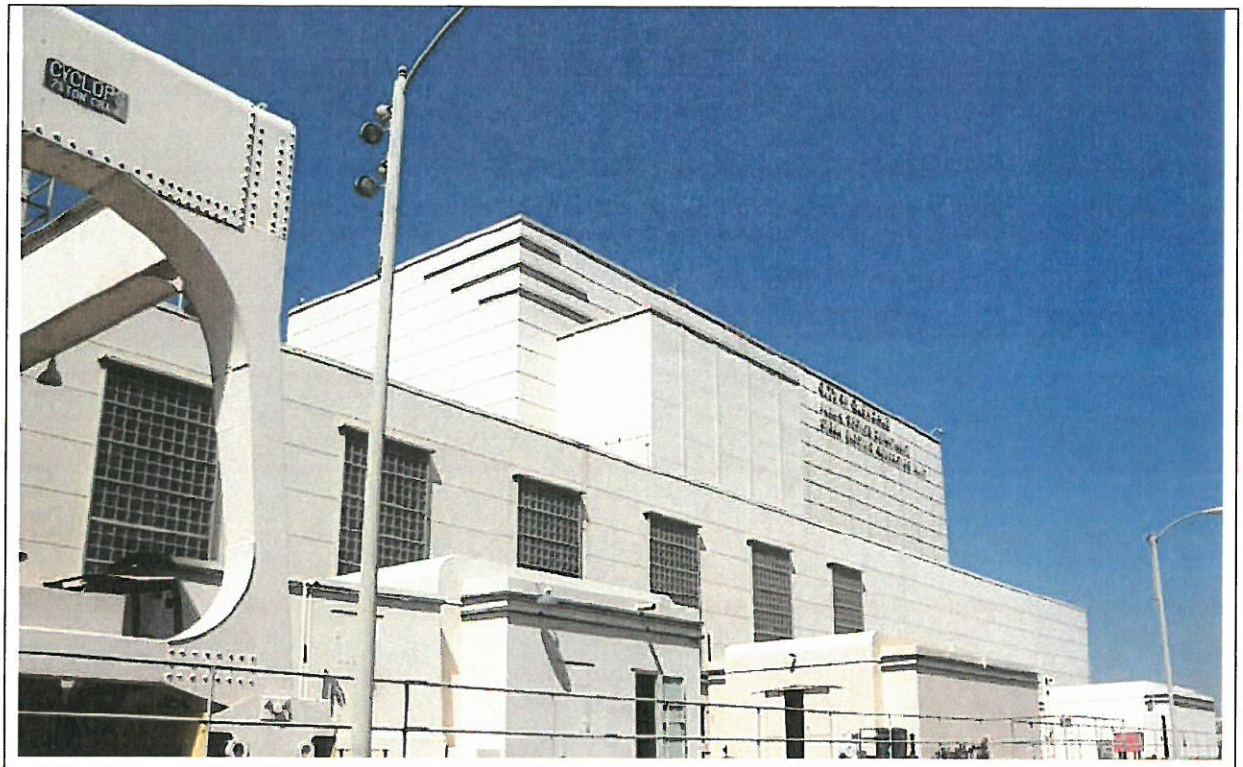

Figure 3: Excerpted, cropped photograph from Initial Study, Architectural Resource Evaluation of The Grayson Power Plant For City of Glendale, California, Figure 18 (page 6.6). View is of the northwest, main façade, no date (estimated 2016). Note the staggered green horizontal bands at the left corner of the tower, the sign at the right side, sets of multi-story, glass block windows of the boiler portion of the building, original, riveted "Cyclops" crane at left foreground and Units 3, 2 and 1 (left-to-right) in the foreground. The turbine covers for Units 1-3 have radiused roof-wall connections on the main volumes at each endwall, modulating the appearances of otherwise entirely utilitarian structures. Double fillet bands wrap around their lower cornices and corners, emphasizing the carefully expressed scale and proportion.

At the cornice of the boiler building, a simple, dimensioned band interposes the roof-wall junctions. The band motif is repeated in pairs on the turbine covers for Units 1-3, the small, utilitarian structures in the foreground of the main elevation (Figure 3). In the design for the Grayson Steam-Electric Power Plant, different volumes are manipulated using varying scale and proportion strategies. The factory-painted, metal exterior of the main tower is clad in small rectangles that together form a grid. The lower, "Boiler Building" main portion of the plant is has a stucco-finished exterior divided by stacked horizontal scoring lines. The turbine covers for Units 1-5 are painted metal, single-story housings with curved ends and lower, filleted endwalls. The Initial Study cultural resources evaluation mistakenly identified the exterior metal panel material as asbestos, which is likely incorrect as well as needlessly alarming (Figure 20, 6.7). Nearly 15 years after its completion, the unique exterior shell on the turbine covers at Glendale Power Plant was described in *Power Plant Management,* "the housing is fabricated of steel and is lifted in a piece from over the turbine- generator"(Robert Henderson Emerick, 1955). We assert that the Stripped Classicism design of the power plant is an outstanding example of a rare

type of architecture, the architect-designed power plant. The Stripped Classicism design should be considered the work of a master architect, Daniel A. Elliot, AIA (1898-1978). California Register Criterion 3 includes properties that "...represent... the work of an important creative individual." The Grayson Steam-Electric Power Plant is eligible for listing in the California and Glendale Registers under both Criteria 3 for Stripped Classicism design and as the work of a master architect.The subject property is further significant for its engineering and construction methods. The Grayson Steam-Electric Power Plant was described in the *Los Angeles Times* as "the world's first completely earthquake-proof ... plant... Among its unique features is the location of the huge turbo-generator on an uncovered deck... the only building is a shell built of light steel and stucco filter walls that will more or less cover the unsightly appearance of boilers."[2] R.R. Martel, a Caltech professor and widely recognized international authority on seismic engineering collaborated on the design. Martel (1890-1965) was among the first engineers in the nation to concentrate on earthquake-resistant buildings and is considered the first in California.[3] He was one of two founders of the Earthquake Engineering Research Institute, an independent, nonprofit organization which was established "to promote research on safe and economical earthquake resistant structures" worldwide and continues to thrive, providing that service on an international scale to this day.

Its earthquake-proof structure was prescient for the late 1930s. An engineering periodical by the Earthquake Engineering Research Institute focused on seismic safety. "Earthquake Spectra: The Professional Journal of the Earthquake Engineering Research Institute" ran numerous articles specifically describing earthquake-related damage to power plants in the greater Los Angeles area fifty years later, between 1987 and 1994. While Glendale's Power Plant is listed in data and tables with plants that sustained significant damage, no damage to Grayson Steam-Electric Power Plant from those events is enumerated. Similarly, "Seismic Experience Data--Nuclear And Other Plants: Proceedings Of A Session," prepared by the American Society of Civil Engineers, describes Glendale's Power Plant remaining "on-line" during the 1971 earthquake, despite its proximity to Sylmar, which was considered the epicenter (1985). We are not saying the subject property building can withstand all earthquakes; in the past it demonstrated superior seismic strength compared to its peers in the Los Angeles area. The Grayson Steam-Electric Power Plant was designed to be "earthquake-proof" before any other facilities of its type were, which is overridingly consequential in California engineering. The property possesses significance as the earliest known example of an earthquake-proof power plant in California or anywhere else.

Both the California and the local register recognize construction and engineering innovation. California Register Criterion 3 states "It embodies the distinctive characteristics of a type, period, region, or *method of construction*; represents the work of an important creative individual." The Grayson Steam-Electric Power Plant is eligible for listing in the California and Glendale Registers under each Criteria 3 for its method of early earthquake proof construction. None of those avenues of its significance was addressed in the reconnaissance level survey prepared for the Grayson Steam-Electric Power Plant.

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[2] "Power Plant Built In Open: Glendale Will Have First Completely Quake-Proof Setup." *Los Angeles Times*. June 30, 1940: A10.

[3] "R. R. Martel, Professor of Structural Engineering Staff" *Engineering and Science*, Volume 19, 1956: 22-24.

Direct Association with Lauren W. Grayson

The significance of Chief Engineer and General Manager Lauren W. Grayson (1907-1972) is also not adequately evaluated. When Grayson retired in 1970, he had served the city for nearly two decades and expanded water and power capacity by 400 percent and the budget by an even higher percentage during his tenure ("Public Services Head in Glendale to Retire" *Los Angeles Times.* 25 January, 1970: SG-B2). The visionary civil servant was responsible for bringing together other agencies for collaboration in the northwest. That joint power alliance was considered monumental in the field, and brought electrical capacity diversification, as well as lower costs, to Glendale-based users. He oversaw both water and power utilities, constantly interpreting and planning for future community needs.

Lauren Grayson was responsible for the addition of cleaner technologies, including a steam-electric generating unit (1965) and the nation's first gas turbine peaking unit in his final year. Grayson served as president of American Water Works and California Municipal Utilities associations and was elected American Water Works Man of the Year (1959). He was considered a national leading authority on public utilities and delivered academic papers on a wide variety of utility-based subjects throughout his career. Grayson was published on subjects ranging from visionary long-range planning to the unique needs of car wash and drive-in usage in a number of national and regional industry periodicals, including *The American City*, *Engineering News & Record*, *Western City* and *Aqueduct News*. Under his leadership, Glendale was one of the first local communities to require subterranean power lines. The *Times* succinctly described his career at retirement as an "outstanding achievement in the field of water and power" (Don Snyder "Glendale Official: Public Service Chief to End Long Career" *Los Angeles Times.* 6 July 1970:B9). The Power Plant was named in his honor in 1972. Mr. Grayson lived in Glendale after 1951 was buried at Forest Lawn. The Grayson Steam-Electric Power Plant is eligible for listing in the California and Glendale Registers under each Criteria 2 for its direct association with Lauren W. Grayson during his period of significant, local utility-related achievements.

The period of significance of the Grayson Steam-Electric Power Plant commenced in 1941 when it was completed and ended in 1970, when Loren W. Grayson retired. Neither the California nor the Glendale Register has requirements that a property be completed more than 50 years ago. For the purposes of National Register eligibility, the period of significance would end in 1967, because it does not meet the requirements in Criterion Consideration G for properties that have achieved exceptional significance in the past 50 years.

Because the California Register Technical Assistance Bulletin 7 is currently under review for updates and revisions, there is no current state guidance for nominating California Register properties and National Register of Historic Places guidance is used in its place. In the National Park Service-prepared National Register Bulletin "How to Prepare the National Register Criteria for Evaluation," under "Determining the Relevant Aspects of Integrity" for properties associated with important events or persons it states:

> A property important for association with an event, historical pattern, or person(s) ideally might retain *some* features of all seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. *Integrity of design and workmanship, however, might not be as important to the significance,* and would not be relevant if the property were a site. A basic integrity test for a property associated with an important

event or person is whether a historical contemporary would recognize the property as it exists today.

Grayson Steam-Electric Power Plant retains integrity to its location. The building remains on the original site where it was completed in 1941. The power plant building's original Stripped Classicism design is intact, the painted stucco walls and metal panels that camouflage day-to-day operations of the facility, including the three staggered, green bands that wrap around the southeast corner and original signage, are visible and recognizable to the general public from the public right of way. Its setting in an essentially flat yard among other large utility apparatuses has changed over time, reflecting upgrades, increases in capacity, and new technologies, but continues to be the basic, recognizable surroundings of a power plant. Its distinctive painted metal and stucco exterior materials endure, as do other visible elements from its original design including multi-story glass block banks of windows, awning-type steel sash windows, decorative fillets, metal sign letters, decorative turbine covers and the essential building configuration. The condition of those materials reflect the passage of 77 years, as should be expected. The fit, finish and connections of those original materials remains impeccable, revealing its inventive, Depression-era workmanship. Because the other aspects of integrity remain intact, the feeling and associations of the Grayson Steam-Electric Power Plant, while somewhat reduced by the additions of new outbuildings and facilities, remains. The property maintains its original, intended use, and judging by publicly visible portions of the building, it retains essential qualities that evoke the aesthetic and historic senses it would have had in 1941 when it was completed.

National Register guidance clearly states "A property that has lost some historic materials or details can be eligible *if* it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation." The Grayson Steam-Electric Power Plant retains its original inventive massing, its essential spatial relationship with the larger yard, the carefully designed proportions, the original, visible, main fenestration, the textures of painted metal, stucco and other materials and its distinctive, austere ornamentation (Figures 2-5)

The improperly prepared evaluation for historic significance in the Initial Study expended an inordinate amount of research to justify the misguided point that the power plant has impaired integrity because of alterations. The architect-designed power plant is the resource in question-not the not the entire surrounding yard. The Initial Study ardently describes the addition of switching yards, additional units, cooling tanks and towers, sheds, a warehouse, storage buildings and a garage which are not connected to the Grayson Power Plant and are immaterial to the evaluation of the building. Those non-contributing features comprise the setting of the subject property and do not affect its integrity or significance. To the average reader, hurrying through the document to achieve a basic understanding, their assertion that the power plant is not historically significant would seem well justified. Professionally qualified reviewers who are experienced as performing such evaluations arrive at entirely different conclusions as described in this letter.

We assert that if Lauren W. Grayson, for whom the property was named, were able to see the subject property today, he would plainly recognize the Grayson Steam-Electric Power Plant. Whether or not a person associated with the property during its period of significance would find it recognizable is among the National Register thresholds for integrity. It remains clearly recognizable to its original appearance. The addition of buildings, cooling towers, fuel tanks and other equipment is typical of and are necessities to continuously operating a power plant,

particularly in a community where its existence made population growth possible. It can be assumed that no public power plant dating from 1941 that remains in operation would be devoid of any alterations made since its completion. Keeping up with requirements, particularly those for life safety, requires inevitable alterations to buildings and structures. Comparison between the photographs in Figures 3 and 4 as well as others validates that the building is absolutely recognizable to its original design, and claims of its loss of integrity are exaggerated and not based in facts.

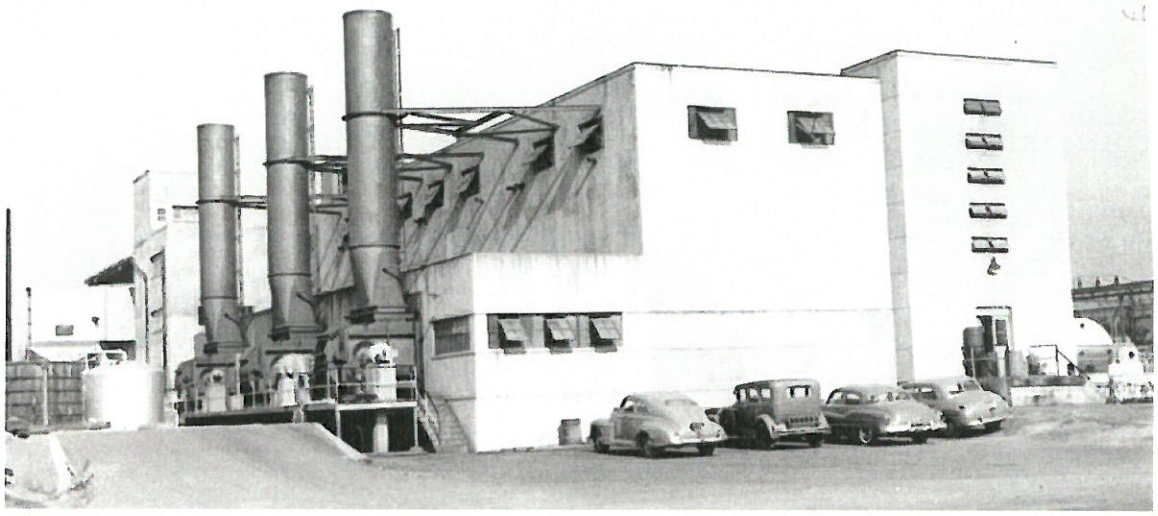

Figure 4: Grayson Steam-Power Plant Building, view northwest of south endwall, circa 1950s. Source: https://commons.wikimedia.org/wiki/File:Grayson_Power_Plant.jpg, not for publication.

Figure 5: Excerpt from Initial Study, Architectural Resource Evaluation Of The Grayson Power Plant For City of Glendale, California, undated photograph estimated 2016, (Figure 26 Grayson Boiler Building page 6.10, same view as Figure 4 above). Note all visible awning-type, steel sash windows, exterior materials, the building configuration and Stripped Classicist design remain recognizable. Carport at lower center is an addition (year unknown). Note the stucco scoring bands at the right-hand boiler building tower and the dimensioned continuous sill and header on the left-hand bank of ribbon windows that enunciate the endwalls, providing visual interest and relief. Other than the carport, no alterations are visible.

A brief review of National Register-listed power plants in the United States revealed that all remaining in use contain non-contributing buildings and structures and that nearly all of the main buildings had been altered.[4] In Pasadena, the Glenarm Power Plant was determined eligible for the National Register for its associative and design significance, despite hundreds of alterations made to the building and larger power plant complex over time and numerous changes to the building since it was completed in 1928. The very visible, east facing, rear side of the Glenarm Power Plant is entirely concealed by alterations made in the past 20 years. Comparison against like types is one of many tests for significance and the Grayson Steam-Power Plant stacks up favorably against its significant peers in terms of it importance to the development of the community, its design significance, and its retention of integrity. We believe that the Grayson Steam-Electric Power Plant is eligible for listing in the National Register as well as the California and local registers, but the property is not publicly accessible to make site visits and perform a complete, intensive evaluation of its significance.

Previously Recorded Resources

In the Initial Study, the preparers included a list of "previously recorded" built environment resources, mistakenly applying what is normally archaeological methodology to the built environment. Not only does the section not inform the evaluation, it demonstrates their misunderstanding of the task. The absence or presence of built environment resources within a half a mile is not a predicator as it can be in archaeology, of whether or not built environment resources can be expected to be encountered. Moreover, the list provided does not enumerate whether or not the studied properties were found to be significant or not, rendering it even less useful.

The only "previously recorded resources" that should be considered in this evaluation would be on the subject property (including any previous evaluations), or would be other power plants against which this property should rightly have been compared. See National Register guidance on "Comparing Similar Properties" in "VIII. How to Evaluate The Integrity of A Property" (National Park Service, "How to Apply the National Register Criteria For Evaluation")

Conclusion

CEQA strongly encourages early consultation with interested or affected parties, which includes local historic advocacy groups. No consultation efforts were made with TGHS. We were asked for information early in the process but have not otherwise been consulted on the project.

Predicated on the facts and issues presented above, TGHS believes that the Grayson Steam-Electric Power Plant must be re-evaluated for historic significance in a supplementary document and that the Cultural Resources section of the environmental document must be revised to reflect a good faith and more reasoned analysis of the property's historic significance. We have presented "substantial evidence" for the lead agency to change its conclusion and find that the Grayson Steam-Eclectic Power Plant building is a historical resource for the purposes of CEQA.

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[4] National Register-listed power plants include: Adams Power Plant Transformer House (Niagara Falls, NY); American Falls Power Plant Transformer House (American Falls, IA); Moran Municipal Generating Station (Burlington, VT); Murray City Diesel Power Plant (Murray City, UT); Pratt Street Power Plant (Baltimore, MD); Power Plant No. 1 (McPherson, KS); Seaholm Power Plant (Austin, TX) and Spaulding Power Plant and Dam (Greely City, NB). The Adams Power Plant Transformer House is no longer is use; its contributing buildings are notably no longer extant. Seaholm Power Plant contained a non-contributing structure when it was listed in the National Register. It has since been redeveloped and is no longer used as a power plant.

Thank you for your consideration.

Sincerely,

Greg Grammer

President
The Glendale Historical Society

cc: Jay Platt

778

Krause, Erik

From: Francie Comstock <francie1026@gmail.com>
Sent: Sunday, November 19, 2017 11:24 AM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 778-1

This expansion will cause more harm than good. As a community we need to move forward with progressive momentum towards clean energy, NOT DIRTY! I have two children and do not want them exposed to more toxins in our air, it is dirty enough. We frequent areas as a family to many locations within proximity of this plant, (Americana, Glendale Galleria, Travel Town, LA Zoo, Autry Museum, Parks). Please help to find a better solution! 778-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 778-3

Regards,

Francie Davis, Glassel Park

779

Krause, Erik

From: galen gering <galenlgering@gmail.com>
Sent: Sunday, November 19, 2017 2:23 PM
To: Krause, Erik
Subject: Grayson

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 779-1
This decision to reactive is purely motivated by greed and not need. 779-2
I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 779-3

Regards,

G Gering

780

Krause, Erik

From: Earthjustice <action@earthjustice.org> on behalf of George Cabico <info@earthjustice.org>
Sent: Sunday, November 19, 2017 9:37 AM
To: Krause, Erik
Subject: Please reject plants to rebuild the Grayson natural gas power plant

Nov 19, 2017

Deputy Director of Community Development Erik Krause

Dear Deputy Director of Community Development Krause,

Thank you for reading my letter.

As a Glendale resident, I'm writing to express my strong opposition to a new gas-fired power plant in our community. Please reject plans to rebuild the Grayson natural gas power plant in favor of clean energy alternatives. 780-1

Thousands of people live and work directly within the Grayson project's impact zone, which includes schools, daycare centers, homes for the elderly and offices. Glendale's air quality is already terrible--it's time to invest in an energy grid that can turn that around. 780-2

Furthermore, Glendale does not urgently need the power from this project. Even without Grayson, the city has enough energy to cover our daily needs most of the time. Our summertime spikes can be met with clean energy, just as other communities around California are doing.
The Grayson project leaves Glendale sitting on (and Glendale residents paying for) way more electricity than we need. 780-3

We have the means to power our city with renewable energy. Let's not tie ourselves to fossil fuel infrastructure that will harm our families and our checkbooks for decades. Cities across California are ditching fossil fuel power and we can too. It's time for Glendale to step into a clean air, clean energy future. 780-4

Sincerely,

George Cabico

Glendale, CA 91201
george_cabico@yahoo.com

781

THE GLENDALE HISTORICAL SOCIETY
CONSERVING OUR HERITAGE

P.O. Box 4173 Glendale CA 91202
www.GlendaleHistorical.org

November 19, 2017

Mr. Erik Krause
Interim Deputy Director of Community Development
City of Glendale Community Development Department
633 E Broadway, Room 103
Glendale CA 91206

RE: Comments on Proposed Grayson Repowering Project Draft Environmental Impact Statement

Dear Mr. Krause:

On behalf of the Board of Directors of The Glendale Historical Society (TGHS), I would like to thank you for the opportunity to comment on the draft Environmental Impact Report (DEIR) for the Proposed Grayson Repowering Project. Established in 1979, TGHS is a non-profit organization with more than 700 members dedicated to the preservation of Glendale's history and architectural heritage through advocacy and education.

We disagree with the findings that the Grayson Steam Electric Power Plant is not a historical resource as defined in CEQA. We believe that the consultant's assessment of historic significance is fundamentally flawed. TGHS believes that the Grayson Steam Electric Power Plant may be eligible for listing in the National Register and that it is eligible for listing in the California and Glendale Registers for its associative as well as for its design and engineering significance. We also believe the DEIR is flawed in other important ways described in detail below. 781-1

<u>Tribal Cultural Resources</u>

We note that the "Tribal Cultural Resources" chapter of the DEIR is incorrectly titled. This inaccuracy demonstrates a lack of basic understanding of the intent of the section and the task by preparers. The purpose of what is normally called a Cultural Resources chapter in an EIR is to identify and evaluate the potential for a project to affect paleontological, archaeological and historical resources. Resources of concern include fossils, prehistoric and historic artifacts, burials, sites of religious or cultural significance to Native American groups, and historical resources. 781-2

The Glendale Historical Society (TGHS) advocates for the preservation of important Glendale landmarks, supports maintaining the historic character of Glendale's neighborhoods, educates the public about and engages the community in celebrating and preserving Glendale's history and architectural heritage, and operates the Doctors House Museum. TGHS is a tax-exempt, not-for-profit 501(c)(3) organization, and donations to TGHS are tax-deductible to the extent permitted by law.

Its essential questions should be:

> Is there a historical resource that may be affected by the proposed project; and
>
> Will the project result in a substantial adverse change to the extent that the resource's historical value is materially impaired or lost?

Evaluations for historic significance are not normally "negative" as stated in the document; historical resources either exist or they do not. Negative findings are an archaic term that was used in solely archaeological investigations and do not apply to the built environment. That paragraph, along with the section title, the evaluation and analysis contained therein, alerts informed readers to the fact that the entire section may have been prepared primarily by archaeologists practicing outside of their fields of expertise. 781-2

The Tribal Cultural Resources title implies that only archaeological resources and tribal concerns were considered. Under CEQA, Initial Studies and EIRs address Cultural Resources, not merely "Tribal Cultural Resources."

Preparer Qualifications

The preparer qualifications presented in the Initial Study (1.4 Cultural Resources Project Staff Qualifications) do not demonstrate that any staff meet the Secretary of the Interior's Professional Qualifications Standards. A statement in the closing paragraph claims "The Stantec Cultural Resources *Program Manager* and *Senior Architectural Historians* directing the survey meet the Professional Qualification Standards of the Department of the Interior" but provides no particulars regarding degrees attained and more importantly does not identify any staff members' fields of expertise (emphasis added). Each provides numbers of years preparing reports, but none of the brief biographies provides evidence to corroborate meeting the Secretary of the Interior's Professional Qualifications Standards codified in CFR Part 61.

The guidance in Archeology And Historic Preservation: Secretary of the Interior's Standards and Guidelines [as Amended and Annotated] directs "The qualifications define minimum education and experience required to perform identification, evaluation, registration, and treatment activities. In some cases, additional areas or levels of expertise may be needed, depending on the complexity of the task and the nature of the historic properties involved." The website for the Historical Architect responsible for the report states that he specializes "in custom residential architecture, and also do[es] commercial projects" (http://www.johnterryarch.com/Introduction-1). Enumerated experience on that website includes two "renovations" but no rehabilitations or restorations are listed. No evidence of a year or more of graduate study or of professional experience including "detailed investigations of historic structures, preparation of historic structures research reports, and preparation of plans and specifications for preservation projects" as cited in the Professional Qualifications Standards is provided. We submit that this evaluation for historic significance is a complex case, and that the preparers provide no evidence of additional levels or areas of expertise and show no demonstrated experience with successful evaluations for the National, California, or Glendale Registers. 781-3

Archaeologists are not normally qualified to prepare built environment evaluations, and historians are not interchangeable with historic architects. In the FEIR revised cultural resources technical report all preparers' professional qualifications should be clearly stated, otherwise the reviewers suspect that it was prepared by staff who have generated reports for specific numbers

of years rather than persons with demonstrated expertise necessary to perform the tasks required for this evaluation of historic significance and analysis of effects. 781-3

Laws, Ordinances, Regulations and Standards

The introductory "Laws, Ordinances, Regulations and Standards (LORS)" section is fatally flawed. The applying LORS enumerated are not demonstrated to have any specific application to the project. If federal regulations apply to the proposed project, then Section 106 of the National Historic Preservation Act (as amended) would pertain to the project. If the project has *any* federal nexus, the proper environmental document would likely be an Environmental Impact Statement/Environmental Impact Report (EIS/EIR) rather than merely an EIR.

It is not clear that Section 106 of the National Historic Preservation Act does or does not apply to the proposed project. We expect that a project of this type requires federal permits, licenses or other approvals. If so, Section 106 applies and the appropriate clearance document may be an Environmental Impact Study and well as an Environmental Impact Report.

The federal Environmental Protection Agency (EPA) promulgated the Steam Electric Power Generating Effluent Guidelines and Standards (40 CFR Part 423) in 1974, and amended the regulations in 1977, 1978, 1980, 1982 and 2015. *The regulations cover wastewater discharges from power plants operating as utilities.* The steam electric regulations are incorporated into National Pollutant Discharge Elimination System (NPDES) permits. If a NPDES permit or any other federal approval or license is required for the proposed project, *there is a federal nexus and Section 106 applies*. 781-4

Further, the EPA released a final rule to limit greenhouse gas emissions from new power plants on August 3, 2015. The final "Carbon Pollution Standard for New Power Plants" establishes New Source Performance Standards to limit emissions of carbon dioxide from fossil fuel-fired power plants. If the "Carbon Pollution Standard for New Power Plants" applies to the proposed project or any other federal approval or license is required for the proposed project, *there is a federal nexus and Section 106 applies*.

Please explain how the National Environmental Policy Act would or would not apply to the proposed project. Can the proposed project be considered a major federal action that would be determined to significantly affect the quality of the human environment? 781-5

The "Applicable Federal, State, Local LORS for Tribal [*sic*] Cultural Resources" table and section notably contains no discussion of whether or not the listed LORS apply and why, which is an obvious necessity in such documents. Merely listing the language in LORS does not inform the public or decision-makers in making their decisions regarding the proposed project. 781-6

In the "Applicable Federal, State, Local LORS for Tribal Cultural Resources" table, there are significant errors and omissions. The administering agency column is incorrect *in each entry*. For instance, Section 106 is not administered by the Code of Federal Regulations (CFR). CFR is not and has never been an administering agency; it is codification of the general and permanent rules and regulations (or administrative law) published in the Federal Register by the executive departments and agencies of the federal government. Applicable Federal Agency Programs administer Section 106 with the Advisory Council on Historic Preservation. If that table, which provides no information of value to the analysis, remains, it must be corrected in the Final EIR or a supplemental EIS/EIR. We strongly recommend that it be completed (most of it is blank) and corrected to list correct administering agencies. 781-7

Further, where each of the LORS is enumerated in the narrative sections below, applicable language was merely cut-and-pasted into the document. There is notably no description of how the listed LORS apply to the proposed project, and why, or what it means to the project or analysis, which is critical to understanding what the document is and why preparers came to whatever conclusions they did. Absent this information, the "Tribal Cultural Resources" section of the document is useless, devoid of worthwhile information for decision makers and the public. Reviewers are left wondering what laws, ordinances, and regulations apply to the proposed project, why and how that fits into the analysis at hand. 781-8

Archaeology

Neither the "Existing Conditions" section nor the other parts of the larger "Tribal Cultural Resources" chapter make reference to any archaeological surveys being performed, presenting the property only above-ground when whatever does or does not exist below grade is undeniably part of the subject property's cultural resources existing conditions. No reference was made to any archaeological surveys being performed for the proposed project, to the likelihood of encountering archaeological resources, or to what the expected impacts of effects would be on those resources.

Review of the Initial Study, where the technical reports are sequestered, provides an overview of archaeological surveys being performed in 2003 and 2016, providing no further details. What methods were used? How much of the subject property was surveyed? More importantly, who at the City of Glendale has the appropriate credentials (meeting the Secretary of the Interior's Professional Qualifications Standards in Archaeology) to critically review the reports that ostensibly resulted? Was a subcontractor engaged to review whatever reports resulted from those surveys? Please provide the name and professional qualifications of the archaeologist who reviewed the confidential section of the Initial Study for the City. 781-9

Methodology

The "Methodology" section of the EIR is inadequate as well. The two sentences describing Senate Bill 52 efforts is not equivalent to what should be a description of how project Cultural Resources procedures were carried out. Inserting words that do not apply into a section does not satisfy the requirements of CEQA. The methodology section is intended to explain how the evaluation and analysis were prepared that lead the preparers to arrive at the conclusions they did. 781-10

Evaluation for Historic Significance

We additionally submit that because the evaluation of the subject property's historic significance is not included in the document or the appended technical reports, decision makers cannot review the evaluation. Because of that omission, decision-makers and the public cannot make their own conclusions based on information presented as to whether or not the Grayson Steam-Electric Power Plant is historically significant. Thus decision-makers and the public are not able to judge whether substantial adverse change to a historical resources would be materially impaired or entirely lost. The California Code of Regulations (CCR) directs under Technical Detail: 781-11

> The information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. *Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through* *<u>inclusion of supporting information and analyses as</u>*

> *appendices to the main body of the EIR.* Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review (emphasis added, CCR Section 15147).

The applicable cultural resources analysis is not contained in the technical report section, or in an appendix, but was secreted in the Notice of Preparation. Once TGHS was able to locate the "Architectural Resource Evaluation of The Grayson Power Plant For City of Glendale, California" it was reviewed for adequacy by a professional qualified under the Secretary of the Interior's Qualifications Standards in both history and architectural history and was found not to be correct in its conclusions. 781-11

Other EIR reviewers will not know where to find the evaluation for historic significance. Because that analysis is not "readily available for public examination" it does not "assist in public review" as required. We strongly stress that the conclusion that the Grayson Steam-Electric Power is not historically significant was made in error and that the revised, corrected evaluation should be a technical appendix to the FEIR and that the FEIR should address alternatives to the project that would retain the historical resource and/or mitigate its loss if it were proven not to be feasible, based on facts.

The evaluation failed to consider the power plant as a contributor to a larger, previously unevaluated historic district as well, which is a fundamental component in any such survey. 781-12

Like the archaeological investigation, no evidence is provided of any lead agency review of the conclusions in the report being performed by qualified staff or consultants for the City of Glendale. The conclusions in the EIR that are based on incorrect finding in the Initial Study must be peer-reviewed for accuracy by professionally qualified professionals with demonstrated expertise in the applicable fields. 781-13

Reconnaissance Survey

The evaluators note in the survey type on the DPR form that the evaluation is an "Architectural Inventory and Evaluation *Reconnaissance* Survey." We strongly assert that an intensive evaluation must be prepared by local qualified architectural historians who have clear understanding of the Grayson Steam-Electric Power Plant's place in local and regional history and who have demonstrated experience in applying the criteria for Glendale Register of Historic Resources to evaluations for significance. We assert that the property's National, California Register and local significance were not properly considered and that its conclusions are incorrect.

National Register guidance prepared by the Department of the Interior provides a definition in "Guidelines for Local Surveys A Basis For Preservation Planning: "*Reconnaissance* may be thought of as a 'once over lightly' inspection of an area, most useful for characterizing its resources in general and for developing a basis for deciding how to organize and orient more detailed survey efforts." 781-14

Likewise directions in "The Secretary of the Interior's Guidelines for Identification" state

> Reconnaissance survey might be most profitably employed when gathering data to refine a developed historic context—such as checking on the presence or absence of expected property types, to define specific property types or to estimate the distribution of historic properties in an area… *In most cases, areas surveyed in this way will require resurvey if*

> *more complete information is needed about specific properties*" (emphasis added, Archaeology and Historic Preservation: Secretary of The Interior's Standards and Guidelines, as Amended and Annotated, 48 Federal Register 44716, effective 1983).

781-14

We believe a reconnaissance survey, buried in the Initial Study was not the correct level of evaluation, which should rightly be an intensive survey in a technical appendix to the EIR that would allow reviewers the opportunity to consider the logic of a full evaluation for historic significance.

<u>Is the Grayson Steam-Electric Plant a Historical Resource?</u>

The "Tribal Cultural Resources" [*sic*] EIR section commences with a statement where the authors refute their own justification for finding the Grayson Steam-Electric Power not to be historically significant:

> While the [Grayson Steam-Electric Power] Plant does possess potential significance under the… [California Register] and Glendale Register of Historic Resources Criterions [*sic*] 1, 2, 3, and 4, a lack of integrity under all aspects of integrity recognized by the… [California Register], and implemented for the City of Glendale Register… *which is silent on aspects of integrity*, undermines the property's ability to convey importance/significance for either the state or local registers.

781-15

The Glendale Register has no requirement for integrity. Finding a property not eligible for the Glendale Register because of supposed alterations is not supported in the stated requirements for designation on the local register. Because the Glendale Register has no specific requirements for integrity a property's significance should not be dismissed because of alterations, particularly when the facility being evaluated remains absolutely recognizable to its original appearance.

When properties are significant for associations with the development of the community or with important persons they need not retain the same aspects or level of integrity as a property that is significant only for its design. That concept is a fundamental principle in evaluating properties for historic significance and was markedly not recognized by the document preparers. Furthermore, the addition of separate cooling towers, maintenance and storage buildings, oil tanks and trailers over time would be essential to its continued use as a power plant and would be well-known to qualified, experienced practitioners.

The inadequate evaluation in the Initial Study does not make clear where the described, overly emphasized alterations are, or how they would collectively reduce the property's integrity of design. Table 4 in the Initial Study curiously lists more than 57 building permits (only post 1964), but after review, it is discovered that few, if any are actual alterations to the Grayson Steam-Electric Power Plant that would affect its integrity. The document states "Some of the projects associated with these permits are visible in the aerials…" but no connection between listed building permits and actual alterations that would affect the ability of the property to convey its significance, which is central to the claim of the property not being eligible, has been made.

781-16

Supposed alterations such as "Constructed a new concrete block chemical pump house with concrete roof" (1964), "Constructed one metal shed" (1970) and "Constructed a foundation (only) for a temporary modular trailer" (2012) demonstrate the consultant's lack of

understanding of the crux of an evaluation for historic significance. Does the property have historic significance and if it does, is it recognizable, depending on the type of significance? 781-16

None of those predominately separate actions described as alterations in the Initial Study table or annotated aerials affected the design, location, materials, workmanship, feeling or association of the power plant. Its setting may have changed since it was completed, but its setting in an industrial yard is not as essential to its significance as would the setting of other buildings such as a barn in an open field or adjacent to a barnyard. The subject property remains in a utility yard setting as it has been historically. The additional small buildings and other structures and objects that have been added to the subject property are located on the northwest and southwest, non-character-defining, secondary and rear sides of the plant as demonstrated in Figure 1.

Figure 1 makes evident the fact that there are no alterations on the façade or northeast side, none are shown on the southeast end wall (a carport was added sometime after 1950 that does not affect its integrity), various small additions on the non-character-defining southwest side and only a ramp was added on the northwest side.[1] Further text will describe why other small changes do not affect its integrity. The building's principal cladding materials remain, its original ribbon, hopper-type and glass block multi-story windows remain, the original metal sign on stand-outs and the distinctive, staggered, horizontal corner fillets remain intact. An experienced architectural historian would have exercised appropriate professional judgment and omitted items that were not alterations that affected the actual resource under consideration. The Grayson Steam-Electric Power Plant structure retains more than adequate integrity to its original design by Daniel A. Elliott, AIA, and remains recognizable. 781-17

[1] An "addition to boiler room" at the southwest corner is noted in the Initial Study Figure 15 annotated aerial photographs incorrectly as being added around 1979 (Aerial 4). That small addition is clearly evident in Aerial 2, the 1964 aerial photograph.

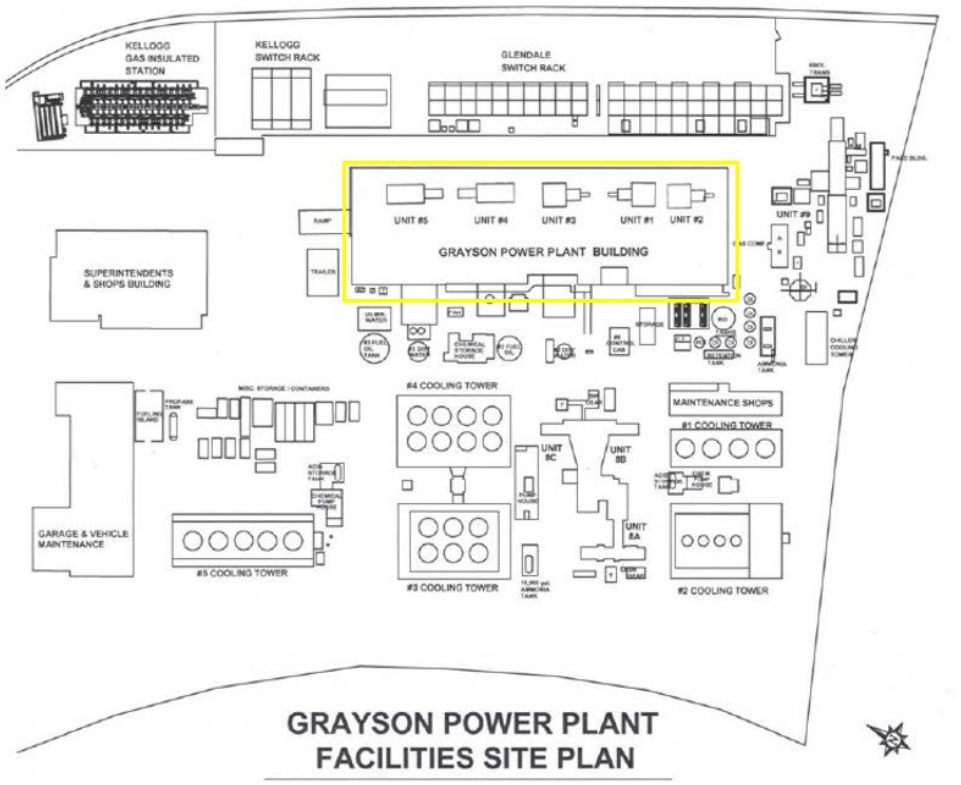

Figure 1: Excerpted and annotated from Architectural Resource Evaluation of The Grayson Power Plant For City of Glendale, California, showing only a ramp and trailer on the northwest (left-hand) side of the main building and various additional facilities at the back or southwest side of the Grayson Steam-Power Plant Building. Note that very few alterations in this figure are connected to the main, Grayson Steam-Power Plant Building, which is highlighted in yellow.

781-17

Grayson Steam-Electric Power Plant Significance

The Grayson Steam-Electric Power Plant is significant for its association with the development of the community, for its direct association with Lauren W. Grayson, likely for its Stripped Classicism design, as the work of a master architect, and as the first earthquake-proof power plant. Its integrity of design remains, clearly visible from all but one nearby street, the large, metal and stucco-clad building is visible, and the inventive, original design remains easily distinguishable.

781-18

Association with the Development of the Community

The power plant's connection to the development of Glendale is reasonably straightforward and is undeniable. Almost immediately after Glendale's incorporation, locals recognized the importance and costs savings of establishing independent utilities. Once street lighting became an issue, the new city government took action to establish a "light and power" entity, holding a bond election to acquire and construct an electric works system for the city by 1909 (Winston W. Crouch and Beatrice Dinerman, *Southern California Metropolis: A Study of Development of a Government for a Metropolitan Area*, 1964). An expanded distribution service and the establishment of the Glendale Light and Power Company were part of the consequences of that election. Without the existence of the subject property power plant, the community would not have had the necessary utility capacity to grow as it did after the second World War. In 1938,

781-19

the *Los Angeles Times* substantiated the assertion that the power plant made development of the community possible, reporting "City officials have maintained steadily that there are no available sources of power and that erection of the generating plant is necessary" ("City Officials Deny Charges in Glendale Power Plant Plan" 26 May 1938:14). The resulting power plant was built at an estimated cost of $1.5 million.

In the two decades spanning its construction, the population of modern Glendale increased by more than 50 percent between 1930 and 1950, from approximately 63,000 to 96,000 (U.S. Census). Neighboring Pasadena and other comparable communities' populations did not grow by nearly as great a percentage as Glendale's unfettered growth during that period. The stratospheric evolution of Glendale as a population and business center was spurred partly by annexation but as much by its increased ability to independently provide inexpensive power to newly expanding and establishing businesses and the thousands of new homes and apartments that were built during that time. That tendency continued "between 1980 and 2000, Glendale grew significantly more than neighboring areas" (City of Glendale, Government Departments, Economic Development, "Great Demographics," "Top 10 Reasons You Want Your Business in Glendale" at http://www.glendaleca.gov/government/departments/glendale-economic-development-corporation-/top-10-reasons-you-want-your-business-in-glendale/analytic-information). Sustaining that trend that was made partly possible by the existence of an independent power source, the population of Glendale soared by nearly 40 percent during that 20-year period, significantly more than any other single city in Los Angeles County and more than the county itself. Without an autonomous power source providing economical electricity, the unbridled population growth and expansion of Glendale after World War II would not have been possible. The power plant shaped that development rather than merely reflecting it. Because of that direct connection between Glendale's growth and the Grayson Steam-Electric Power Plant, it is eligible for listing in the California and Glendale Register under each Criterion 1 for its essential role making the postwar development of the community possible. 781-19

<u>Distinctive Stripped Classicism Design, Work of a Master, and Engineering Significance</u>

Stripped Classicism was a twentieth century architectural style that reduced all, or nearly all superfluous ornamentation. It was favored primarily by government agencies for public building designs and was widely used by the Works Progress Administration during the Depression. The style embraced simplified but recognizable classicism in its overall massing, scale and proportions while eliminating traditional decorative detailing.

The significance of the restrained design by architect Daniel Anthony Elliot, A.I.A. for the main building remains plainly visible and recognizable, but it is not adequately explored in the reconnaissance level evaluation. The original, remaining design placed a large amount of equipment inside a metal-clad, deftly stepped shell that articulated a large volume from what could have been an ungainly multi-street block shape into human-scaled units, reducing its apparent mass and creating an elegant solution to what could well be an entirely utilitarian facility. In addition the electrical turbines, which are entirely functional apparatuses used to drive generators to transform mechanical energy into electrical energy by electromagnetic induction, are cloaked in cleverly designed covers that supplement the large scale Stripped Classicism design elements of the facility into smaller units. At least three pencil-drawn renderings were made to demonstrate design alternatives that would camouflage the practical features. 781-20

It would be helpful to reviewers to understand the architect's remarkable career. Elliott was a designer for Gilbert Stanley Underwood, a recognized master architect, between the years 1925 and 1932, was a contributor to the Colorado Aqueduct Project (1932-'41), and was responsible for the designs of various other water and power plants (see "Experience Record," Daniel A. Elliott, AIA, Architect at http://dbase1.lapl.org/webpics/calindex/documents/04/515676.pdf). Elliott designed the Burbank Water & Power Building (1949, 164 W. Magnolia Bl, Burbank) which is a noted example of Late Moderne design, as illustrated by the Los Angeles Conservancy on its website (Explore LA, Historic Places <https://www.laconservancy.org/locations/burbank-water-and-power>). His utility portfolio was described in the "Public Imagery and Its Uses" section of *Los Angeles In the Thirties: 1931-1941*, which is considered an expert source on local architecture during that period (Gebhard and Von Bretton 1989).

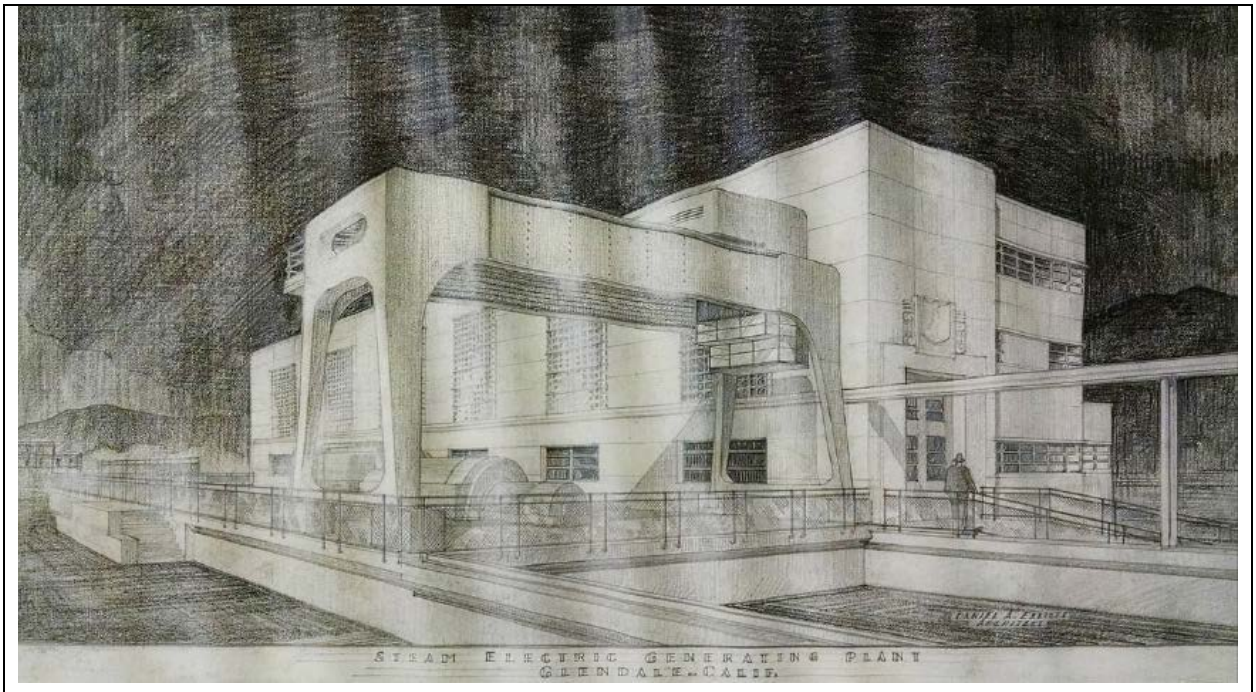

Figure 2: Pencil rendering of Glendale "Steam Electric Generating Plant" by Daniel A. Elliott, AIA excerpted from Initial Study, Architectural Resource Evaluation of The Grayson Power Plant For City of Glendale, California, Figure 9 (page 4.5). Compare with the recent photograph in Figure 3 that shows a series of multi-story, glass block windows in the boiler building portion of the Grayson Steam-Electric Power Plant building. If the crane in the foreground was at the south rather than the north end, the rendering and the power plant as it exists today would appear nearly the same, clearly expressing its distinctive Stripped Classicism design. The design treatment for the endwall in the above rendering was ultimately executed without the cartouche or the inset entrance. It is mistakenly called an "architectural drawing" rather than a rendering in the Initial Study.

The still-recognizable, Stripped Classicism design of the Grayson Steam-Electric Power Plant is understated, exquisitely proportioned, and was undeniably futuristic for its time. The three staggered, green horizontal strokes that wrap around the southeast corner skillfully punctuate the otherwise staid building composition and assert the Modernism of the design. At the north façade, left-justified bronze letters on stand-outs primly identify the facility: "City of Glendale Public Service Department Steam Electric Generating Plant." Most power plans in the 1930s and

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now have no architectural design, reducing their aesthetic effects on the community, which is part of the significance of the Grayson Steam-Electric Power Plant's design.

Figure 3: Excerpted, cropped photograph from Initial Study, Architectural Resource Evaluation of The Grayson Power Plant For City of Glendale, California, Figure 18 (page 6.6). View is of the northwest, main façade, no date (estimated 2016). Note the staggered green horizontal bands at the left corner of the tower, the sign at the right side, sets of multi-story, glass block windows of the boiler portion of the building, original, riveted "Cyclops" crane at left foreground and Units 3, 2 and 1 (left-to-right) in the foreground. The turbine covers for Units 1-3 have radiused roof-wall connections on the main volumes at each endwall, modulating the appearances of otherwise entirely utilitarian structures. Double fillet bands wrap around their lower cornices and corners, emphasizing the carefully expressed scale and proportion.

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At the cornice of the boiler building, a simple, dimensioned band interposes the roof-wall junctions. The band motif is repeated in pairs on the turbine covers for Units 1-3, the small, utilitarian structures in the foreground of the main elevation (Figure 3). In the design for the Grayson Steam-Electric Power Plant, different volumes are manipulated using varying scale and proportion strategies. The factory-painted, metal exterior of the main tower is clad in small rectangles that together form a grid. The lower, "Boiler Building" main portion of the plant is has a stucco-finished exterior divided by stacked horizontal scoring lines. The turbine covers for Units 1-5 are painted metal, single-story housings with curved ends and lower, filleted endwalls. The Initial Study cultural resources evaluation mistakenly identified the exterior metal panel material as asbestos, which is likely incorrect as well as needlessly alarming (Figure 20, 6.7). Nearly 15 years after its completion, the unique exterior shell on the turbine covers at Glendale Power Plant was described in *Power Plant Management*, "the housing is fabricated of steel and is lifted in a piece from over the turbine- generator"(Robert Henderson Emerick, 1955). We assert that the Stripped Classicism design of the power plant is an outstanding example of a rare

type of architecture, the architect-designed power plant. The Stripped Classicism design should be considered the work of a master architect, Daniel A. Elliot, AIA (1898-1978). California Register Criterion 3 includes properties that "…represent… the work of an important creative individual." The Grayson Steam-Electric Power Plant is eligible for listing in the California and Glendale Registers under both Criteria 3 for Stripped Classicism design and as the work of a master architect.The subject property is further significant for its engineering and construction methods. The Grayson Steam-Electric Power Plant was described in the *Los Angeles Times* as "the world's first completely earthquake-proof … plant… Among its unique features is the location of the huge turbo-generator on an uncovered deck… the only building is a shell built of light steel and stucco filter walls that will more or less cover the unsightly appearance of boilers."[2] R.R. Martel, a Caltech professor and widely recognized international authority on seismic engineering collaborated on the design. Martel (1890-1965) was among the first engineers in the nation to concentrate on earthquake-resistant buildings and is considered the first in California.[3] He was one of two founders of the Earthquake Engineering Research Institute, an independent, nonprofit organization which was established "to promote research on safe and economical earthquake resistant structures" worldwide and continues to thrive, providing that service on an international scale to this day.

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Its earthquake-proof structure was prescient for the late 1930s. An engineering periodical by the Earthquake Engineering Research Institute focused on seismic safety. "Earthquake Spectra: The Professional Journal of the Earthquake Engineering Research Institute" ran numerous articles specifically describing earthquake-related damage to power plants in the greater Los Angeles area fifty years later, between 1987 and 1994. While Glendale's Power Plant is listed in data and tables with plants that sustained significant damage, no damage to Grayson Steam-Electric Power Plant from those events is enumerated. Similarly, "Seismic Experience Data--Nuclear And Other Plants: Proceedings Of A Session," prepared by the American Society of Civil Engineers, describes Glendale's Power Plant remaining "on-line" during the 1971 earthquake, despite its proximity to Sylmar, which was considered the epicenter (1985). We are not saying the subject property building can withstand all earthquakes; in the past it demonstrated superior seismic strength compared to its peers in the Los Angeles area. The Grayson Steam-Electric Power Plant was designed to be "earthquake-proof" before any other facilities of its type were, which is overridingly consequential in California engineering. The property possesses significance as the earliest known example of an earthquake-proof power plant in California or anywhere else.

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Both the California and the local register recognize construction and engineering innovation. California Register Criterion 3 states "It embodies the distinctive characteristics of a type, period, region, or *method of construction*; represents the work of an important creative individual." The Grayson Steam-Electric Power Plant is eligible for listing in the California and Glendale Registers under each Criteria 3 for its method of early earthquake proof construction. None of those avenues of its significance was addressed in the reconnaissance level survey prepared for the Grayson Steam-Electric Power Plant.

781-22

[2] "Power Plant Built In Open: Glendale Will Have First Completely Quake-Proof Setup." *Los Angeles Times*. June 30, 1940: A10.

[3] "R. R. Martel, Professor of Structural Engineering Staff" *Engineering and Science*, Volume 19, 1956: 22-24.

Direct Association with Lauren W. Grayson

The significance of Chief Engineer and General Manager Lauren W. Grayson (1907-1972) is also not adequately evaluated. When Grayson retired in 1970, he had served the city for nearly two decades and expanded water and power capacity by 400 percent and the budget by an even higher percentage during his tenure ("Public Services Head in Glendale to Retire" *Los Angeles Times.* 25 January, 1970: SG-B2). The visionary civil servant was responsible for bringing together other agencies for collaboration in the northwest. That joint power alliance was considered monumental in the field, and brought electrical capacity diversification, as well as lower costs, to Glendale-based users. He oversaw both water and power utilities, constantly interpreting and planning for future community needs.

Lauren Grayson was responsible for the addition of cleaner technologies, including a steam-electric generating unit (1965) and the nation's first gas turbine peaking unit in his final year. Grayson served as president of American Water Works and California Municipal Utilities associations and was elected American Water Works Man of the Year (1959). He was considered a national leading authority on public utilities and delivered academic papers on a wide variety of utility-based subjects throughout his career. Grayson was published on subjects ranging from visionary long-range planning to the unique needs of car wash and drive-in usage in a number of national and regional industry periodicals, including *The American City*, *Engineering News & Record*, *Western City* and *Aqueduct News*. Under his leadership, Glendale was one of the first local communities to require subterranean power lines. The *Times* succinctly described his career at retirement as an "outstanding achievement in the field of water and power" (Don Snyder "Glendale Official: Public Service Chief to End Long Career" *Los Angeles Times.* 6 July 1970:B9). The Power Plant was named in his honor in 1972. Mr. Grayson lived in Glendale after 1951 was buried at Forest Lawn. The Grayson Steam-Electric Power Plant is eligible for listing in the California and Glendale Registers under each Criteria 2 for its direct association with Lauren W. Grayson during his period of significant, local utility-related achievements. 781-23

The period of significance of the Grayson Steam-Electric Power Plant commenced in 1941 when it was completed and ended in 1970, when Loren W. Grayson retired. Neither the California nor the Glendale Register has requirements that a property be completed more than 50 years ago. For the purposes of National Register eligibility, the period of significance would end in 1967, because it does not meet the requirements in Criterion Consideration G for properties that have achieved exceptional significance in the past 50 years. 781-24

Because the California Register Technical Assistance Bulletin 7 is currently under review for updates and revisions, there is no current state guidance for nominating California Register properties and National Register of Historic Places guidance is used in its place. In the National Park Service-prepared National Register Bulletin "How to Prepare the National Register Criteria for Evaluation," under "Determining the Relevant Aspects of Integrity" for properties associated with important events or persons it states:

> A property important for association with an event, historical pattern, or person(s) ideally might retain *some* features of all seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. *Integrity of design and workmanship, however, might not be as important to the significance,* and would not be relevant if the property were a site. A basic integrity test for a property associated with an important 781-25

> event or person is whether a historical contemporary would recognize the property as it exists today.

Grayson Steam-Electric Power Plant retains integrity to its location. The building remains on the original site where it was completed in 1941. The power plant building's original Stripped Classicism design is intact, the painted stucco walls and metal panels that camouflage day-to-day operations of the facility, including the three staggered, green bands that wrap around the southeast corner and original signage, are visible and recognizable to the general public from the public right of way. Its setting in an essentially flat yard among other large utility apparatuses has changed over time, reflecting upgrades, increases in capacity, and new technologies, but continues to be the basic, recognizable surroundings of a power plant. Its distinctive painted metal and stucco exterior materials endure, as do other visible elements from its original design including multi-story glass block banks of windows, awning-type steel sash windows, decorative fillets, metal sign letters, decorative turbine covers and the essential building configuration. The condition of those materials reflect the passage of 77 years, as should be expected. The fit, finish and connections of those original materials remains impeccable, revealing its inventive, Depression-era workmanship. Because the other aspects of integrity remain intact, the feeling and associations of the Grayson Steam-Electric Power Plant, while somewhat reduced by the additions of new outbuildings and facilities, remains. The property maintains its original, intended use, and judging by publicly visible portions of the building, it retains essential qualities that evoke the aesthetic and historic senses it would have had in 1941 when it was completed. 781-25

National Register guidance clearly states "A property that has lost some historic materials or details can be eligible *if* it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation." The Grayson Steam-Electric Power Plant retains its original inventive massing, its essential spatial relationship with the larger yard, the carefully designed proportions, the original, visible, main fenestration, the textures of painted metal, stucco and other materials and its distinctive, austere ornamentation (Figures 2-5)

The improperly prepared evaluation for historic significance in the Initial Study expended an inordinate amount of research to justify the misguided point that the power plant has impaired integrity because of alterations. The architect-designed power plant is the resource in question-not the not the entire surrounding yard. The Initial Study ardently describes the addition of switching yards, additional units, cooling tanks and towers, sheds, a warehouse, storage buildings and a garage which are not connected to the Grayson Power Plant and are immaterial to the evaluation of the building. Those non-contributing features comprise the setting of the subject property and do not affect its integrity or significance. To the average reader, hurrying through the document to achieve a basic understanding, their assertion that the power plant is not historically significant would seem well justified. Professionally qualified reviewers who are experienced as performing such evaluations arrive at entirely different conclusions as described in this letter. 781-26

We assert that if Lauren W. Grayson, for whom the property was named, were able to see the subject property today, he would plainly recognize the Grayson Steam-Electric Power Plant. Whether or not a person associated with the property during its period of significance would find it recognizable is among the National Register thresholds for integrity. It remains clearly recognizable to its original appearance. The addition of buildings, cooling towers, fuel tanks and other equipment is typical of and are necessities to continuously operating a power plant, 781-27

particularly in a community where its existence made population growth possible. It can be assumed that no public power plant dating from 1941 that remains in operation would be devoid of any alterations made since its completion. Keeping up with requirements, particularly those for life safety, requires inevitable alterations to buildings and structures. Comparison between the photographs in Figures 3 and 4 as well as others validates that the building is absolutely recognizable to its original design, and claims of its loss of integrity are exaggerated and not based in facts.

781-27

Figure 4: Grayson Steam-Power Plant Building, view northwest of south endwall, circa 1950s. Source: https://commons.wikimedia.org/wiki/File:Grayson_Power_Plant.jpg, not for publication.

Figure 5: Excerpt from Initial Study, Architectural Resource Evaluation Of The Grayson Power Plant For City of Glendale, California, undated photograph estimated 2016, (Figure 26 Grayson Boiler Building page 6.10, same view as Figure 4 above). Note all visible awning-type, steel sash windows, exterior materials, the building configuration and Stripped Classicist design remain recognizable. Carport at lower center is an addition (year unknown). Note the stucco scoring bands at the right-hand boiler building tower and the dimensioned continuous sill and header on the left-hand bank of ribbon windows that enunciate the endwalls, providing visual interest and relief. Other than the carport, no alterations are visible.

781-27

A brief review of National Register-listed power plants in the United States revealed that all remaining in use contain non-contributing buildings and structures and that nearly all of the main buildings had been altered.[4] In Pasadena, the Glenarm Power Plant was determined eligible for the National Register for its associative and design significance, despite hundreds of alterations made to the building and larger power plant complex over time and numerous changes to the building since it was completed in 1928. The very visible, east facing, rear side of the Glenarm Power Plant is entirely concealed by alterations made in the past 20 years. Comparison against like types is one of many tests for significance and the Grayson Steam-Power Plant stacks up favorably against its significant peers in terms of it importance to the development of the community, its design significance, and its retention of integrity. We believe that the Grayson Steam-Electric Power Plant is eligible for listing in the National Register as well as the California and local registers, but the property is not publicly accessible to make site visits and perform a complete, intensive evaluation of its significance. 781-27

Previously Recorded Resources

In the Initial Study, the preparers included a list of "previously recorded" built environment resources, mistakenly applying what is normally archaeological methodology to the built environment. Not only does the section not inform the evaluation, it demonstrates their misunderstanding of the task. The absence or presence of built environment resources within a half a mile is not a predicator as it can be in archaeology, of whether or not built environment resources can be expected to be encountered. Moreover, the list provided does not enumerate whether or not the studied properties were found to be significant or not, rendering it even less useful.

The only "previously recorded resources" that should be considered in this evaluation would be on the subject property (including any previous evaluations), or would be other power plants against which this property should rightly have been compared. See National Register guidance on "Comparing Similar Properties" in "VIII. How to Evaluate The Integrity of A Property" (National Park Service, "How to Apply the National Register Criteria For Evaluation") 781-28

Conclusion

CEQA strongly encourages early consultation with interested or affected parties, which includes local historic advocacy groups. No consultation efforts were made with TGHS. We were asked for information early in the process but have not otherwise been consulted on the project.

Predicated on the facts and issues presented above, TGHS believes that the Grayson Steam-Electric Power Plant must be re-evaluated for historic significance in a supplementary document and that the Cultural Resources section of the environmental document must be revised to reflect a good faith and more reasoned analysis of the property's historic significance. We have presented "substantial evidence" for the lead agency to change its conclusion and find that the Grayson Steam-Eclectic Power Plant building is a historical resource for the purposes of CEQA. 781-29

[4] National Register-listed power plants include: Adams Power Plant Transformer House (Niagara Falls, NY); American Falls Power Plant Transformer House (American Falls, IA); Moran Municipal Generating Station (Burlington, VT); Murray City Diesel Power Plant (Murray City, UT); Pratt Street Power Plant (Baltimore, MD); Power Plant No. 1 (McPherson, KS); Seaholm Power Plant (Austin, TX) and Spaulding Power Plant and Dam (Greely City, NB). The Adams Power Plant Transformer House is no longer is use; its contributing buildings are notably no longer extant. Seaholm Power Plant contained a non-contributing structure when it was listed in the National Register. It has since been redeveloped and is no longer used as a power plant.

Thank you for your consideration.

Sincerely,

Greg Grammer

President
The Glendale Historical Society

cc: Jay Platt

782

Krause, Erik

From: Hanah Snavely <hanahliona@gmail.com>
Sent: Sunday, November 19, 2017 7:12 AM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 782-1

Pollution does not respect fence lines and zip codes. We are bringing children into this world. We want them to thrive. 782-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 782-3

Regards,

Hanah Cota, 90042

783

Krause, Erik

From: hols1234@aol.com
Sent: Sunday, November 19, 2017 9:02 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson repowering project

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 783-1

We've been living on the East side of Los Angeles for seven years. We've had two children since moving here who are now five and 20-months.We've watched the Glendale, Atwater and Silver Lake/Los Feliz neighborhoods boom and blossom. People move to these neighborhoods because the communities are perfect for raising kids, but have also maintained aspects of city coolness. Hearing about Grayson's repowering plan makes me rethink living here, and I know other moms are feeling the same way. You are hearing from many of them. Please please please hire an independent consultant to review Grayson's EIR and give us all peace of mind. 783-2

Again: I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 783-3

Thank you,

Holly Schlesinger, Silver Lake

784

Krause, Erik

From: Jacquelyn Langberg <jacquelyn.elyse@me.com>
Sent: Sunday, November 19, 2017 5:16 PM
To: Krause, Erik
Subject: Opposition to Grayson

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 784-1

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 784-2

Regards,
Jacquelyn Hrobuchak, Echo Park

785

Krause, Erik

From: Jane Park-Dolan <janeparkdolan@gmail.com>
Sent: Sunday, November 19, 2017 2:24 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson Power Plant Expansion Project

Dear Mr, Krause,

I am writing to express my strong opposition to the Glendale Grayson repowering project as outlined in the September 2017 Draft EIR. 785-1

The location of the power plant is very near to my home. My children play in the park near the plant and the 140,000 annual metric tons of carbon dioxide emissions that will be generated by the expansion are unacceptable for me and my family. Emissions generated by the plant will be carried by the winds in all directions and densely populated Highland Park and surrounds will be greatly affected. 785-2

I call on the City to pause the CEQA process and immediately commission an *independent* study of clean energy alternatives for powering Glendale. To ensure objectivity, this study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR for their vested interest will disallow their objectivity. 785-3

Best Regards,

Jane Park-Dolan

Los Angeles, CA

786

Krause, Erik

From: Jane Sheldon <janesheldonmusic@gmail.com>
Sent: Sunday, November 19, 2017 4:47 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 786-1

I have a two year old, and there are many sweet, young children in our neighborhood whom this will effect. 786-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 786-3

Regards,

Jane Sheldon, north west Glendale resident

787

Krause, Erik

From: Janelle Randazza <jrandazza@gmail.com>
Sent: Sunday, November 19, 2017 4:41 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 787-1

As we all know, LA County loses billions each year to Arizona, as we are forced to sell our surplus energy to them. We deal with the pollution and they get free energy. Power Plants are closing as more homes resort to clean energy, like solar. This is a most ill-thought-out project. 787-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 787-3

Regards,

Janelle Randazza
Glassell Park

Sent from my iPhone

788

Krause, Erik

From: Jeff <glencane@yahoo.com>
Sent: Sunday, November 19, 2017 5:12 PM
To: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara; Krause, Erik
Subject: Grayson repowering project

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 788-1

I live within 1 mile of the power plant and have children who I don't want expose to any additional health issues. 788-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 788-3

Regards,

J. Battista, Glendale Resident

789

Krause, Erik

From: Jenna Gering <iamjennagering@yahoo.com>
Sent: Sunday, November 19, 2017 2:47 PM
To: Krause, Erik; Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: STOP GRAYSON!!!

To whom it may concern,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 789-1

The expansion of this power plant poses a serious health risks. There is ZERO question this will effect my children's respiratory and cognitive health. I'm assuming you all live in Glendale, are you seriously going to risk your family's health!!! 789-2
WHAT IS GOING ON HERE!!!!!!

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 789-3

Regards,

Jenna Gering
Glendale resident

790

Krause, Erik

From: Jennifer Bernhardt <jennypalenny@gmail.com>
Sent: Sunday, November 19, 2017 9:27 PM
To: Krause, Erik; Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Stop Grayson

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. Both my kids go to school in Los Feliz and Burbank , i work in a preschool in Glendale. I'm very concerned for our health spending all day in the Glendale neighborhood ! 790-1 790-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. Regards, 790-3

Jennifer Bernhardt

Sent from my iPhone

791

Krause, Erik

From: Jens Hommert <jens@hommert.net>
Sent: Sunday, November 19, 2017 8:47 PM
To: Krause, Erik; Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: My opposition to Grayson EIR

Dear Mr Krause,
With this letter I want to express my firm opposition to the Grayson repowering project as it was outlined in the Draft EIR of September 2017. 791-1
As a father of two Kids visiting Glendale Montessori School in close proximity to the proposed project I am worried about the health of my children and will hold the city responsible to provide clean air for us and our children to breathe. 791-2
As Architect with a background in city planning I can not understand why the City of Glendale can not realize the unique potential of a clean river with clean air and the enormous benefits this will have for the development of the City of Glendale in the future. The idea of creating an oversized fossil fuel driven power plant with increased fine particle emissions in the center of what should become Glendales recreational center with residential areas, movie studios, a connection to the soccer park, the zoo and Griffith park via a proposed new pedestrian/bicycle bridge will block the development of Glendale for the foreseeable Future. Instead of hugely lucrative projects for the City, like the Americana on Brand, the Warner Brothers Studio or entreponeurial projects like the Golden Road Brewery the City will attract with projects like the Grayson repowering project only more heavy industry with all their problematic pollution along the river and their environmental cleanup costs. 791-3
I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 791-4

Regards,
Jens Hommert, Glendale, November 19.2017

792

Krause, Erik

From: Jerome Gross <jdgross@gmail.com>
Sent: Sunday, November 19, 2017 5:29 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 792-1

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 792-2

Regards,

Jerome Gross
Glendale, California

793

Krause, Erik

From: Jesse Levison <jesse.levison@gmail.com>
Sent: Sunday, November 19, 2017 9:05 PM
To: Krause, Erik
Subject: Stop Grayson Power Plant expansion

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 793-1

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 793-2

Regards,

Jesse Levison
Glendale, CA

794

Krause, Erik

From: Dandelion <dandelion451@gmail.com>
Sent: Sunday, November 19, 2017 7:19 PM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 794-1

This LA Times opinion piece sums up my objections perfectly:

https://www.google.com/amp/www.latimes.com/socal/glendale-news-press/opinion/tn-gnp-me-commentary-brotman-20170810-story,amp.html 794-2

We need to invest in clean energy and reduce emissions, not increase them.

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 794-3

Best,

Jessica Judd, Mt. Washington, Los Angeles

Sent from my iPhone

795

Krause, Erik

From: jessica wise <wisejess@mac.com>
Sent: Sunday, November 19, 2017 11:32 AM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson EIR

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 795-1

I feel strongly that I don't want to be the vicinity of 100% dirty energy plan. talking points 795-2

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 795-3

Regards,

Jessica Wise Los angeles 90065

796

Krause, Erik

From: Earthjustice <action@earthjustice.org> on behalf of Jillian Rise <info@earthjustice.org>
Sent: Sunday, November 19, 2017 3:37 PM
To: Krause, Erik
Subject: Please reject plants to rebuild the Grayson natural gas power plant

Nov 19, 2017

Deputy Director of Community Development Erik Krause

Dear Deputy Director of Community Development Krause,

I am out raged that you would consider doing something like this. I used to work for the city of Glendale water and power department, and you greedy conscious-less sacks of soulessness are really going too far now. If people knew what it was really like in there the way I do from the time I spent working in that horrible place, they would be sick to their stomach's to know how dishonest you are. Now you are literally trying to hurt us. You are going to have an uprising if you try to push this through. Whomever came up with this idea should be ashamed of themselves. Thoughtless! 796-1

As a Glendale resident, I'm writing to express my strong opposition to a new gas-fired power plant in our community. Please reject plans to rebuild the Grayson natural gas power plant in favor of clean energy alternatives. 796-2

Thousands of people live and work directly within the Grayson project's impact zone, which includes schools, daycare centers, homes for the elderly and offices. Glendale's air quality is already terrible--it's time to invest in an energy grid that can turn that around. 796-3

Furthermore, Glendale does not urgently need the power from this project. Even without Grayson, the city has enough energy to cover our daily needs most of the time. Our summertime spikes can be met with clean energy, just as other communities around California are doing.
The Grayson project leaves Glendale sitting on (and Glendale residents paying for) way more electricity than we need. 796-4

We have the means to power our city with renewable energy. Let's not tie ourselves to fossil fuel infrastructure that will harm our families and our checkbooks for decades. Cities across California are ditching fossil fuel power and we can too. It's time for Glendale to step into a clean air, clean energy future. 796-5

Sincerely,

Jillian Rise

Glendale, CA 91207
youdonotneedmypersonalemail@noway.com

797

From:	Papazian, Eliza
To:	Krause, Erik
Cc:	Godinez, Christine; van Muyden, Gillian
Subject:	FW: VOTE NO
Date:	Monday, November 20, 2017 5:06:18 PM
Attachments:	image001.png image002.png image003.png image004.png

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Eliza Papazian | City of Glendale | Management Services
613 East Broadway, Suite 200 | Glendale, CA 91206 | (818) 548-4844 | epapazian@glendaleca.gov

From: JOAN [mailto:borasunrise@comcast.net]
Sent: Sunday, November 19, 2017 9:16 PM
To: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara; ekraus@glendaleca.gov
Subject: VOTE NO

Please vote NO to allowing GWP to repower and expand the Dirty Fossil Fuel driven Grayson Power Plant. 797-1

The citizens of Glendale do not need to have any more toxic particles in the air, not only to save our earth but to save anyone from any serious health issues. 797-2

Please take the time on this and PLEASE VOTE NO. 797-3

Thank you,
Joanie Vaughn

Sent from XFINITY Connect Mobile App

798

Krause, Erik

From: Jolene Taylor <JTaylor@valetparkingservice.com>
Sent: Sunday, November 19, 2017 9:14 AM
To: Krause, Erik
Cc: Gharpetian, Vartan; Devine, Paula; Agajanian, Vrej; Sinanyan, Zareh; Najarian, Ara
Subject: Grayson Repowering Project

Dear Mr. Krause:

Good morning. I am the president of the homeowners association closest to the Grayson Power Plant (Pelanconi Estates) and I am writing, on behalf of our board, to express our strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 798-1

Several of us on the board were fortunate to receive a private tour of the plant and see first-hand what this massive project will entail. In addition, I attended the GWP Commission Hearing wherein the consultant presented analysis that there would be "less than significant impacts" during most of the demolition and construction process. Please know that the consultant firm for the construction of the Fairmont flyover also found "less than significant impacts" and, I can tell you first-hand, that was not the case. There is no doubt that there will be significant impacts with the demolition and "repowering" of Grayson. 798-2

I am aware that you have received countless emails requesting an independent study of clean energy alternatives. While I am not an expert, it has come to my attention that there are many options that will be less harmful to nearby Glendale residents (fewer gases, etc.) and I respectfully request that the City of Glendale put the health and safety of us first and explore this option. One speaker at the GWP hearing summed it up best when he said that there will be an increase in emissions in Glendale, despite off-sets and that if someone lit up a cigar and blew it in Steve Zurns face, Mr. Zurn would be offended and he wouldn't care that the gentleman paid someone else not to light up a cigar so it all balances out. 798-3

Again, I respectfully request that the City pause the CEQA process and immediately commission an <u>independent study</u> of clean energy alternatives for powering Glendale. The health of our neighborhood depends on this. 798-4

Thank you.

Jolene Taylor

799

Krause, Erik

From: Jrh330 <jrh330@yahoo.com>
Sent: Sunday, November 19, 2017 1:13 PM
To: Krause, Erik
Subject: Opposition. To Grayson

Dear Mr. Krause,

I am writing to express my strong opposition to the Grayson repowering project as outlined in the September 2017 Draft EIR. 799-1

I call on the City to pause the CEQA process and immediately commission an independent study of clean energy alternatives for powering Glendale. This study should be conducted by a group such as NREL or E3 with strong clean energy credentials and not by the consultants who have been working on the Grayson EIR. 799-2

Regards,

-- Jonathan Harris
Los Angeles 90065