Final Environmental Impact Report

City of Glendale Biogas Renewable Generation Project

August 2, 2021

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ERRATA ATTACHMENTS

A: Updated Project Emission Inventory
B: Updated Project Air Quality Model Input / Output
C: Updated Project Health Risk Assessment Information
D: Updated Project GHG Emission Inventory
E: Noise Monitoring Sheets

DOCUMENT ERRATA

The following minor revisions or errata have been made to correct spelling and/or typing errors and additions within the Final EIR. Additions and corrections are in Red text and deletions can be found as strikethrough black text (i.e. ~~text~~). Note that Sections 9 (Response to Comments) and 10 (Mitigation Monitoring and Reporting Plan) are included in the Final EIR as black text.

Section	Page	Errata
Table of Contents	TOC	Updated Table of Contents with Figures 4.3-2 and 4.3-3.
1.2.3	1.3 - 1.4	Updated text to reflect potential increase of LFG available.
4.2.2.3	4.51	Updated text to include South Coast Air Quality Management District Rule 1149 – Storage Tank and Pipeline Cleaning and Degassing.
4.2.4.4	4.61 - 4.62	Updated text to reflect potential increase of LFG available and volume combusted by proposed engines, regeneration flare, and waste flares.
	4.63	Updated emissions estimates in Tables 12 and 13.
	4.64 - 4.65	Updated background and Project impact data for Table 15.
	4.91	Updated text to related to potential air quality impacts of adjacent future recreation land use.
	4.95 - 4.96	Updated emissions estimates in Table 17 and related text.
	4.96 - 4.97	Deleted Table 18 and referenced updated Table 15.
4.2.4.7	4.98	Updated text to reference regenerative flare and waste flares.
	4.99	Updated text to address potential presence of dioxins and furans.
	4.100 - 4.101	Deleted Table 19.
4.2.4.10	4.102	Updated maximum individual cancer risk values in Table 20 .
4.2.4.11	4.102 – 4.103	Updated hazard index values in Table 21.
4.2.4.12	4.103	Updated text to show health risks to adjacent future recreation land use would be less than significant.
4.2.5	4.104	Updated text to show potential cumulative air quality impacts in consideration of adjacent future recreation land use would be less than significant.
4.3	Added Figure 4.3-2 (National Wetlands Inventory Map).	
	Added Figure 4.3-2 (Project Impact Areas).	
4.3.4	4.153	Updated Mitigation Measures BIO-3 and BIO-4.
	4.156	Updated Mitigation Measures BIO-5.
	4.158	Updated Mitigation Measures BIO-6.
	4.158 – 4.159	Added Mitigation Measures BIO-7A, 7B, and 7C related to bats.
	4.161	Updated Table 25 to provide clarification on temporary and permanent impacts.
	4.162 – 4.164	Updated Mitigation Measure BIO-8 (formerly BIO-7 in the Draft EIR).
4.6.4	4.204	Updated text and Tables 29 and 30 to reflect potential increase of LFG available.

4.7.4.6	4.220	Updated text to remove reference to Mitigation Measure FIRE-4: Firefighting Tools. Firefighting Tools are covered in Mitigation Measure FIRE-1: Fire Protection Plan.
5.6.5	5.17	Updated Table 55 indicating that transportation and traffic impacts of Alternative 3 would be greater than the proposed Project
5.6.6	5.18	Updated text to indicate Alternative 3 would have greater impacts to nine environmental factors compared to the proposed Project.
7.0	7.1 – 7.2	Updated references for the Final EIR.

ERRATA ATTACHMENTS

A: Updated Project Emission Inventory
B: Updated Project Air Quality Model Input / Output
C: Updated Project Health Risk Assessment Information
D: Updated Project GHG Emission Inventory
E: Noise Monitoring Sheets

Project (refer to Section 5.0 for a discussion of alternatives to the proposed Project). However, the environmental baseline was updated in this EIR for the following resource categories and reasons.

Air Quality and Greenhouse Gases: At the time the previous IS/MND was prepared, LFG was mixed with natural gas, conveyed through an existing unground pipe system to the Grayson Power Plant (Grayson) and burned in boilers at Grayson to make steam for electricity generation. Since that time, none of the existing operating engines at Grayson have the capacity to burn LFG. During the process of evaluating potential environmental impacts of modernizing (or "repowering") the Grayson, the City learned that emissions from combusting the LFG in the existing Grayson boilers exceeded potential health risk notification and action plan thresholds established by the South Coast Air Quality Management District. Accordingly, since April 1, 2018, the City ceased combusting LFG at Grayson and has been flaring all of the LFG at the SCLF in compliance with the existing SCAQMD permit. The baseline air quality and greenhouse gas settings have correspondingly been updated in this EIR to reflect this change.

The South Coast Air Quality Management District additionally passed new regulations in January 2019 that requires landfills that do not convert 80% percent or more of LFG to beneficial use to replace the existing LFG flares with new flares that comply with more stringent NOX and VOC emissions. The potential environmental impact analysis of the proposed Project and alternatives to the proposed Project consider this regulatory update.

The City received comments during public review of the Draft EIR that expressed concern that the LFG volumes assumed in the previous IS/MND and Draft EIR were lower than more recent LFG volume estimates that became available after preparation of both Project environmental documents. The comments further noted that the EIR's potential air quality and climate change impacts should be evaluated based on more recent and higher LFG volume estimates. Based on an independent life estimate by SCS Engineers, the Scholl Canyon Landfill is currently estimated to reach capacity between 2025 and 2026 (SCS, 2020). A peak 135.26 MMBtu/hr LFG at a flow rate of 6,200 standard cubic feet per minute and 36 percent methane is expected to be produced and captured at Scholl Canyon Landfill during 2022. The volume and methane content of LFG would then decrease over time. Utilizing the peak volume and methane content of LFG as the basis for analyzing potential environmental impacts of the Project in this EIR represents a worst-case scenario as less LFG would be expected to be produced, captured, and combusted in post-2022 Project operation years. The reciprocating internal combustion engines do not require supplemental natural gas to operate when the LFG fuel source has an approximate methane content of 34 percent or more. When the methane content of the LFG fuel source is below approximately 34 percent, the reciprocating internal combustion engines require a two to three percent natural gas supplement. If required, natural gas makeup for the Project would be well below the ten percent maximum natural gas makeup threshold applicable to determining Renewable Portfolio Standard eligibility for which the Project qualifies. Additionally, any natural gas makeup required during Project operation would be at a future date when the volume and methane content of LFG available at Scholl Canyon Landfill decreases over time. At no time during operation would the Project combust more than 135.26 MMBtu/hr LFG at a flow rate of 6,200 standard cubic feet per minute and 36 percent methane (even if natural gas makeup is part of this fuel stream). Sections 4.2 (Air Quality) and 4.6 (Greenhouse Gas Emissions) have been updated in this Final EIR to reflect the assumed increase in available LFG volume and methane content. Ambient air quality background concentrations and

meteorological data was also updated in the air quality impact analysis in accordance with SCAQMD guidance.

Biological Resources: Public comments were received during the public hearing considering adoption of the previous IS/MND that the proposed Project could adversely impact the federally threatened and California Species of Special Concern coastal California gnatcatcher (*Polioptila californica californica*). While the previous environmental impact analysis determined a low likelihood of potential presence, Stantec conducted an additional biological survey of the proposed Project site on behalf of the City during preparation of this EIR to re-evaluate the biological setting of the site. The additional biological resources survey confirmed coastal California gnatcatcher (*Polioptila californica californica*) have low potential for occurrence at the proposed Project site due to limited and marginal habitat presence at the site as well as historic recorded occurrences within the proposed Project area. The nearest recorded occurrence is approximately 8.0 miles to the east; however, this observation was over 20 years ago. The most recent record is from 2005, approximately 10.0 miles to the southeast. A description of the updated biological resources setting of the proposed Project is included in Section 4.3 and Appendix C of this EIR.

Hazards and Hazardous Materials: American Society for Testing and Materials indicates a 180-day validity for Phase I Environmental Site Assessment reports; although the original report was not completed for a property transfer, it was conducted under the ASTM guidance and therefore, an updated report was required for submittal with the EIR. The updated Phase I Environmental Site Assessment is in included with this EIR as Appendix G. The update did not result in a change in baseline environmental conditions since the previous IS/MND.

1.2.4 Scoping Meetings

The NOP included notification of two public scoping meetings to be held to further inform public agencies and other interested parties of the proposed Project and to solicit input regarding the Draft EIR. The two public scoping meetings were held at the Glendale Police Department Community Room located at 131 N. Isabel Street in Glendale, CA on April 4, 2019 at 2:00 pm and again at 6:00 pm. These meetings afforded the public an opportunity to provide oral or written comments to the City regarding the scope and focus of the Draft EIR as described in the NOP and Initial Study. The meetings provided a brief presentation of the following information:

1. Purpose of the meetings;
2. Overview of the Project Description;
3. Summary of the Initial Study findings;
4. Review of alternatives being considered for further study within the EIR;
5. Opportunity for Public Comment; including speakers and comment cards; and
6. Closing Remarks discussing the CEQA review process, anticipated schedule, and where to find additional information and updates.

Oral and written comments received from the public were primarily related to the need for the proposed Project the proposed Project objectives as well as concerns for potential impacts to aesthetics, air quality,

ppmv VOC, and 250 ppmv CO (all at 15 percent O_2). Emission control systems such as the proposed selective catalytic reduction (SCR) and CO oxidization systems are needed in order for the proposed landfill gas engines to meet these emission standards.

South Coast Air Quality Management District Rule 1149 – Storage Tank and Pipeline Cleaning and Degassing

This rule requires controls of VOC emissions during the degassing of pipelines. The LFG pipeline would be purged of LFG as part of abandonment. The LFG would be displaced from the LFG pipeline by either pushing the gas from Grayson Power Plant to Scholl Canyon Landfill or by applying a vacuum to the pipeline from Scholl Canyon Landfill. The purged LFG would be collected at Scholl Canyon Landfill and combusted in the flares to avoid venting of the LFG to the atmosphere which would have greater GHG and odor impacts.

Rule 1150.1 – Control of Gaseous Emissions from Municipal Solid Waste Landfills

This rule requires landfill gas control devices to be operated continuously to reduce methane by at least 99 percent by weight and NMOC by at least 98 percent by weight or reduce the outlet NMOC concentration to less than 20 ppmv, dry basis as hexane at three percent oxygen. If lean burn engines are utilized as the gas control units, the engines shall reduce the outlet methane concentration to less 3,000 ppmv, dry basis, corrected to 15 percent oxygen. An initial source test for the proposed equipment will be required to demonstrate compliance with this rule.

South Coast Air Quality Management District Regulation XIII – New Source Review (NSR)

The SCAQMD regulatory framework includes two options for implementing new source review. Certain facilities included in the Regional Clean Air Market (RECLAIM) cap and trade program for NO_X and SO_X are subject to the new source review requirements of Regulation XX. Facilities that are not part of RECLAIM are subject to the NO_X and SO_X new source review requirements of Regulation XIII. New source review for VOC, CO and PM is administered through Regulation XIII for all facilities. The proposed Project is to construct and operate a new landfill gas energy recover facility; therefore, the proposed Project is exempted from the RECLAIM program. The Project is instead subject to the new source requirements of Regulation XIII for all criteria pollutants.

South Coast Air Quality Management District Rule 1303 – New Source Review Requirements: Best Available Control Technology

Rule 1303(a) requires any new or modified source which results in an emission increase of any nonattainment air contaminant, any ozone depleting compound, or ammonia to meet the BACT requirement. BACT is the most stringent emission limitation or control technology which has been achieved in practice (AIP), is contained in any state implementation plan (SIP) approved by the USEPA, or is another technology that has been found to be technologically feasible and cost effective by the Air District. **Table 6** provides a summary of recent BACT determination for the proposed equipment. The BACT determinations for NO_X, VOC, and CO for reciprocating internal combustion engines reflect compliance with emission standards in Rule 1110.2.

4.2.4.4 Operation Impacts due to Stationary Equipment

The Project includes construction and operation of an approximately 12-megawatt (MW) power generation facility that would utilize LFG as fuel to generate renewable energy (electricity). The engines will create emissions due to the combustion of landfill gas.

Based on the fact that the flare will incinerate landfill gas and it will be utilized as needed, its emissions will be analyzed as part of the emissions from the existing flares. The existing flares will operate intermittently as backup devices to incinerate excess landfill gas being produced that is not utilized by the electrical generating units, should one or more generating units be temporarily inoperable.

Because SCLF LFG quality may fluctuate, NG may be utilized to ensure combustion and engine operating efficiency. The augmentation with natural gas is exclusively to maintain the heating value of fuel to ensure combustion and efficient engine operation. The proposed facility will not use natural gas to increase engine utilization. SCAQMD Rule 1110.2 restricts NG combustion to no more than 10% of the fuel stream, based on annual heat input, and the limit on natural gas augmentation will be specified in the SCAQMD operating permit for the Project. Since NG is a cleaner fuel than landfill gas, it is more conservative to analyze the air quality impacts of the proposed engines based on operating emissions using 100 percent landfill gas as the worst-case scenario. When the landfill gas production at the SCLF declines, engine utilization will also decline because SCAQMD regulations and permit conditions will not allow ongoing operation in the absence of landfill gas

Reciprocating Internal Combustion Engines

The City is proposing to use four reciprocating internal combustion engines (RICE) General Electric Jenbacher Model J 620 GS-16 engines for the Project. Each engine has the ability to produce 3,018 kilowatts (KW) of power at 39.5 percent efficiency under International Organization of Standardization (ISO) conditions. At 100 percent operating load, each engine is estimated to be able to combust 1,383 standard cubic feet per minute (scfm) of LFG. ~~With the LFG production of 5,000 scfm, small amounts of natural gas will augment the landfill gas to increase intake fuel heating value which will allow all four engines be operated at 100 percent capacity during brief periods when peak utilization may be needed. Although it is expected that engine utilization will decline as LFG production declines, 100 percent annual utilization of LFG may occur in the first year of operation; therefore, it was used to determine the significance of air quality impacts.~~ As noted in Section 1.2.3 (Baseline Environmental Conditions), LFG production was estimated to be 6,200 scfm and 135.26 MMBtu/hr, based upon a measured heating value of 363.3 Btu/cf (36 percent methane). All four RICEs operating simultaneously can combust a total of 105.36 MMBtu/hr LFG.

The following emission factors were used to estimate the criteria pollutant emissions from the engines:

- 11 ppmv at 15 percent O_2 for NO_X and 30 ppmv at 15 percent O_2 emission factors were used based on the required emission limits pursuant to SCAQMD Rule 1110.2.
- The proposed engines will be equipped with oxidation catalysts to reduce the CO emissions. Based on the manufacturer data, uncontrolled CO emission of the engine is 250 ppmv at 15 percent O_2. While CO emission reductions of at least 90 percent can be expected due to the use of an oxidization catalyst, the emissions inventory and air quality analysis assumes a much

lower control efficiency and a controlled CO concentration of 130 ppmv at 15 percent O_2.

- The engine manufacturer PM10/2.5 emission rate of 0.066 grams per brake horsepower hour (g/bhp-hr), based upon SCAQMD BACT guidance.
- The SO_X emission factor was estimated based on 60 ppmv of sulfur content of landfill gas measured in H_2S as determined by SCAQMD as BACT.

The proposed engines will be equipped with SCR combined with oxidation catalysts to meet SCAQMD emission standards. However, uncontrolled emissions can occur during startup, commission, and maintenance activities. To account for the uncontrolled emission rates and estimate maximum daily emissions, the following daily operating schedule is assumed:

1. Three engines run 22 hours in normal operation and 2 hours in startup/shutdown mode.
2. One engine runs 12 hours in normal operation, 10 hours in maintenance, and 2 hours for startup/shutdown.

It is unlikely to have more than one engine in maintenance in the 24-hour period. Additionally, this type of operation will likely be limited to commissioning of the proposed Project to ensure the engines are operating properly prior to the loading of emission control catalyst.

Regenerative Gas Flare

As noted in Section 2.3.2, the LFG treatment system contains a regenerative gas flare. The regenerative gas flare would combust 5 MMBtu/hr LFG.

Waste Gas Flares

110.26 MMBtu/hr of the total 135.26 MMBtu/hr LFG available would be combusted in the RICEs and regeneration flare. The remaining 24.9 MMBtu//hr would be combusted in the waste flares.

Total Operational Phase Criteria Air Pollutant Emissions

The emissions from the LFG combustion in the existing flare system were used for the baseline emissions during operational phase. The baseline emissions reflected the flare emissions reported in SCAQMD Annual Emission Reporting Program in 2018. This emission inventory is included in Appendix B.2.

Table 12 summarizes the net emissions of the proposed Project based on the daily maximum ~~engine~~ emissions, the daily average flare emissions as the baseline emissions, and the quantity of Priority Reserve credits to offset the emission increases. **Table 13** compares the net emissions of the proposed Project to the SCAQMD screening level mass-emissions significance thresholds. The emission Inventory for the proposed RICE is also included in Appendix B.2.

To comply with SCAQMD Regulation XIII, Priority Reserve credits will be allocated to offset the emission increases of the proposed Project. After consideration of reduced emissions due to the reduced operation of the existing flares and the application of Priority Reserve credits through SCAQMD Rule 1309.1, net emissions of NO_X, VOC, PM10, PM2.5 and SO_X will be below SCAQMD daily mass emission significance thresholds. SCAQMD does not provide Priority Reserve offsets for CO emissions. As such, daily

emissions of CO are above the SCAQMD daily screening level mass emission significance thresholds. A more complex significance determination is made to demonstrate that emissions of CO are also below refined significance thresholds that are based upon ambient pollutant concentrations.

Table 12 Overall Air Quality Impact of the proposed Project in the Operational Phase

Pollutant	Total proposed Project (Engines Daily ~~Max.~~ Emissions (lbs./day)	Less: Existing Baseline Daily Landfill Gas Combustion Emissions (lbs./day)	Offset Allocations from the SCAQMD Priority Reserve (lbs./day)	Remaining Scholl Canyon Power Generating Facility Emissions (lbs./day)
NO_X	~~165~~ 190	90	~~75~~ 100	0
CO	~~919~~ 928	42	0	~~877~~ 886
VOC	~~114~~ 121	7	~~107~~ 114	0
PM10	~~58~~ 71	62	~~0~~ 9	~~[4]~~ 0
PM2.5	~~58~~ 71	62	0	~~[4]~~ 9
SO_X	~~81~~ 93	46	~~35~~ 47	0

Table 13 Comparison of Overall Operation Emissions with Significance Thresholds

Pollutant	Net Operation Emissions (lbs./day)	SCAQMD Mass Daily Significance Thresholds for Operation Emissions (lbs./day)	Exceed the Threshold (yes/no)
NO_X	0	55	NO
CO	~~877~~ 886	550	YES
VOC	0	55	NO
PM10	~~[4]~~ 0	150	NO
PM2.5	~~[4]~~ 9	55	NO
SO_X	0	150	NO

Without the Priority Reserve credits, NO_X, CO, and VOC emissions of the proposed Project would exceed the significance thresholds. Air dispersion modeling was conducted to analyze further impact of pollutants emissions. Air dispersion modeling was not conducted for VOC since there is no State or Federal ambient air quality standards. The data inputs for the emission modeling are provided in **Table 14**.

Table 14 American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) Input Parameters

Input Parameters Type	Specification
Engines Exhaust Information:	
Stack Height:	40 ft.
Stack Diameter:	2 ft.
Stack Temperature:	797 °F
Exhaust Flow (Wet):	481,020 scfh

Table 15 summarizes the ambient air quality impacts from operating the proposed engines, regenerative flare, and waste flares simultaneously to combust the peak annual volume of LFG expected to be available~~. As discussed in Section 4.2.1.2, t~~The background concentration is based upon the highest values recorded for the years ~~2014~~ 2015 through ~~2018~~ 2019 pursuant with SCAQMD recommendations made during public review of the Draft EIR. The values shown in **Table 15** are the highest pollutants concentration values at any receptors outside the SCLF boundary from operating the proposed RICEs, regenerative flare, and waste flares to combust 135.26 MMBtu/hr LFG. The air quality impact analysis methodology and results summarized in Table 15 included a revised and more conservative SCLF boundary than that assumed in the Draft EIR pursuant with SCAQMD recommendations made during public review of the Draft EIR. Model results demonstrate that the proposed Project will not cause an exceedance of NO_2, CO, or PM2.5 ambient air quality standards. PM10 and PM2.5 background ambient concentrations already exceed federal or state standards, but the increase in concentrations resulting from the proposed Project are below allowable thresholds established by SCAQMD. Detailed model input and output information is provided in Appendix B.3.

Table 15 AERMOD Model Output – Baseline Landfill Property Limits

Pollutant	Averaging Period	Project Impact	Background[a]	New Ambient	Limiting Standard	Type of Standard
NO_2[b]	1-HR	~~0.030~~ 0.03702 ppm	~~0.075~~ 0.0719 ppm	~~0.105~~ 0.1089 ppm	0.18 ppm	CAAQS
NO_2[b]	1-HR (98th %)	~~0.014~~ 0.02083 ppm	~~0.060~~ 0.0593 ppm	~~0.074~~ 0.0801 ppm	0.10 ppm	NAAQS
NO2[c]	Annual	~~0.00015~~ 0.00023 ppm	~~0.017~~ 0.0154 ppm	~~0.017~~ 0.0156 ppm	0.03 ppm	CAAQS
CO	1-HR	~~0.0145~~ 0.1748 ppm	~~3.0~~ 2.6 ppm	~~3.01~~ 2.7748 ppm	20 ppm	CAAQS
CO	8-HR	~~0.0344~~ 0.0473 ppm	~~1.8~~ 1.6 ppm	~~1.83~~ 1.6473 ppm	9 ppm	CAAQS
PM10	24-HR	~~1.07~~ 1.373 ug/m^3	96 ug/m^3	~~97.07~~ 97.373 ug/m^3	Allowable increase of 2.5 ug/m^3	CAAQS/SCAQMD Allowable Increase
PM10[d]	24-HR (6th highest over 5 years)	~~0.065~~ 1.046 ug/m^3	96 ug/m^3	~~96.065~~ 97.046 ug/m^3	150 ug/m^3	NAAQS
PM10	Annual	~~0.118~~ 0.193 ug/m^3	~~35.4~~ 34.4 ug/m^3	~~35.52~~ 34.593 ug/m^3	Allowable increase of 1.0 ug/m^3	CAAQS/SCAQMD Allowable Increase
PM2.5	24-HR	~~1.07~~ 1.373 ug/m^3	~~59.9~~ 30.5 ug/m^3	~~60.97~~ 31.873 ug/m^3	Allowable increase of 2.5 ug/m^3	CAAQS/SCAQMD Allowable Increase
PM2.5	24-HR (8th highest)	~~0.35~~ 0.956 ug/m^3	~~38.0~~ 30.5 ug/m^3	~~38.35~~ 31.456 ug/m^3	Below SIL of 1.2 ug/m^3	EPA Significant Impact Level (SIL)

Pollutant	Averaging Period	Project Impact	Background[a]	New Ambient	Limiting Standard	Type of Standard
PM2.5[e]	Annual	~~0.118~~ 0.193 ug/m^3	~~12.38~~ 12.58 ug/m^3	~~12.50~~ 12.773 ug/m^3	Below SIL of 0.3 ug/m^3 Allowable increase of 1.0 ug/m^3	EPA Significant Impact Level (SIL) CAAQS/SCAQMD Allowable Increase
SO_2	1-HR	0.0026 ppm	0.018 ppm	0.021 ppm	0.25 ppm	CAAQS
SO_2[f]	1-HR (99th %)	0.0014 ppm	0.0094 ppm	0.0108 ppm	0.075 ppm	NAAQS
SO_2	24-HR	0.0006 ppm	0.002 ppm	0.0026 ppm	0.04 ppm	CAAQS

Notes:

a) The background values are based on the highest concentrations monitored during ~~2014~~ 2015 through ~~2018~~ 2019.

b) The NO_2 1-hour modeling was refined using the AERMOD Ambient Ratio Method Version 2 (ARM2) option.

c) The NO_2 annual modeling was refined using the AERMOD ARM option, which assumed an 80% conversion factor of NO_X to NO_2.

d) The PM10 24-hour modeled values were based on the maximum 6th highest concentration over 5 years period.

e) The PM2.5 24-hour modeled values were based on the 8th highest concentration averaged over 5 years period with the background concentrations of 98th percentile of 24-hour data averaged over 5 years period.

f) The SO_2 1-hour modeled values were based on the 4th highest concentration averaged over 5 years period with the background concentrations of 99th percentile of 1-hour data averaged over 5 years period.

g) There are receptors surrounding the facility at lower and higher elevations than the emission sources. The model was run on non-default option (flat terrain) on all receptors at lower elevations; and a default option (complex terrain) was selected to on receptors above the emission sources base elevation. The project impact values shown are the highest values from both model runs.

Data Source: The output of air dispersion model conducted using Providence BEEST AERMOD software (version 16216r).

Figures 4.2-1 A through **L** show the maximum concentration readings for criteria pollutants outside the landfill property boundary.

Due to the application of SCAQMD BACT; the offsetting of emissions from SCAQMD priority reserve; and compliance with all applicable laws, ordinances, and regulations; air quality impacts of the proposed Project are less than significant for all pollutants other than CO as shown in Table~~s~~ 13. For all pollutants other than CO, daily mass emissions are below the thresholds of significance that are included in Table 13. Pursuant to SCAQMD policy, an ambient air quality impact analysis was then conducted to determine the significance of CO emissions. Table 15 and Figures 4.2-1A through 4.2.1L show ambient air quality impact analysis results for all criterial pollutants, including CO, demonstrate that project impacts are less than significant and would not conflict or obstruct implementation of the air quality plan.

While it is not known when and what areas of the Scholl Canyon Landfill will be closed, or when such closed landfill areas will be ready for conversion to uses specified in the JPA, it is nonetheless reasonably foreseeable that such a conversion of use will occur at some point in the future. The air quality impact analysis described above which considers simultaneously operating the proposed engines, regenerative flare, and waste flares to combust 135.26 MMBtu/hr LFG show that potential exceedances to ambient air quality would be limited to within 100 meters of the power generation facility. Future recreation land use in adjacent areas after landfill closure could therefore be expected to have a 100-meter buffer from the power generation facility boundary. However, this buffer would represent a small area compared to that available for recreation and would be consistent with the requirements of the JPA.

Mitigation Measures

No mitigation measures are required.

Threshold: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?

See Section 4.2.5, Cumulative Impacts, below for a discussion of cumulative air quality impacts.

Threshold: Expose sensitive receptors to substantial pollutant concentrations?

In addition to the regional significance thresholds, SCAQMD has also developed LSTs to screen projects for potentially substantial localized impacts from daily emission levels from construction and operation based on the project location, size, and distance to the nearest sensitive receptor, which includes residential homes, schools, hospitals, and nursing homes. The nearest sensitive receptors are located more than 2,200 feet from the emission sources. **Figure 4.2-2** shows the location of the sensitive receptor relative to the proposed Project site.

Localized Construction Impacts

As discusses previously in this report, LSTs for the proposed project are based a project area of two acres because LSTs for a larger project are less stringent. SCAQMD requires the mass rate look-up table in the "Finalized Localized Significance Threshold Methodology" document to be used. **Table 16** shows that the impacts of Project construction emissions to the localized air quality are below the significance thresholds.

Table 16 Localized Significance Threshold Construction Analysis

Pollutant Type	Max. Daily Emissions (lbs./day)	SCAQMD Significance Threshold for Construction (lbs./day)	Exceed Threshold (yes/no)
NO_X	41	175	NO
CO	33	7,957	NO
PM10	8.2	160	NO
PM2.5	4.9	82	NO

Notes:
a) The maximum daily emissions for construction activity are the emissions from the earth-moving activity.

Based on **Table 16**, the air quality impact of construction activity to the nearest sensitive receptor will be less than significant.

Mitigation Measures

No mitigation measures are required.

Localized Operation Impacts

Table 17 compares the impacts of project operation emissions to the localized air quality threshold based on the SCAQMD look-up table.

Table 17 Localized Significance Threshold Operation Analysis

Pollutant Type	~~Net~~ Operation Emissions (lbs./day)	SCAQMD Significance Threshold (lbs./day)	Exceed Threshold (yes/no)
NO_X	~~75~~ 190	175	~~NO~~ YES
CO	~~877~~ 928	7,957	NO
PM10	~~[4]~~ 71	39	NO
PM2.5	~~[4]~~ 71	20	NO

Notes:
- The net operation emissions include the ~~maximum~~ daily emissions from engines, regeneration flare, and waste flares without subtraction of existing baseline waste flare emissions~~. less baseline emissions~~. Note that if baseline waste flare emissions were considered, the potential increase in NO_X emissions from the Project would not exceed the LST for NO_X.

As shown in **Table 17**, ~~the air quality impact of operation activity to the nearest sensitive receptor is expected to be less than significant~~ only NOx emissions would exceed the applicable LST (and only when not considering the baseline emissions from the existing waste flares). Pursuant with SCAQMD's LST Guidance, an air quality impact analysis and dispersion modeling were conducted to further evaluate the potential significance of NO_X emissions. As shown in Table 15, the results of the air quality impact analysis and dispersion modeling show proposed Project NO_X emissions would not exceed an applicable air quality standard and would result in a less than significant localized air quality impact.

~~In addition to mass emission analysis, air dispersion modeling was performed to estimate the concentrations of NO_2, CO, PM10 and PM2.5 from the operational emissions of the proposed Project to determine the localized air quality impacts on the state and federal ambient air quality standards.~~

~~**Table 18** summarizes the results of the model and compares them with the ambient air quality standards. Detail model input and output information is provided in Appendix B.3.~~

~~Table 18 AERMOD Model Output~~

~~Pollutant~~	~~Averaging Period~~	~~Project Impact~~	~~Background[a]~~	~~New Ambient~~	~~Limiting Standard~~	~~Type of Standard~~
~~NO_2[b]~~	~~1-HR~~	~~0.030 ppm~~	~~0.075 ppm~~	~~0.105 ppm~~	~~0.18 ppm~~	~~CAAQS~~
~~NO_2[b]~~	~~1-HR (98th %)~~	~~0.014 ppm~~	~~0.060 ppm~~	~~0.074 ppm~~	~~0.10 ppm~~	~~NAAQS~~
~~NO2[c]~~	~~Annual~~	~~0.00015 ppm~~	~~0.017 ppm~~	~~0.017 ppm~~	~~0.03 ppm~~	~~CAAQS~~
~~CO~~	~~1-HR~~	~~0.0145 ppm~~	~~3.0 ppm~~	~~3.01 ppm~~	~~20 ppm~~	~~CAAQS~~
~~CO~~	~~8-HR~~	~~0.0344 ppm~~	~~1.8 ppm~~	~~1.83 ppm~~	~~9 ppm~~	~~CAAQS~~
~~PM10~~	~~24-HR~~	~~1.07 ug/m³~~	~~96 ug/m³~~	~~97.07 ug/m³~~	~~Allowable increase of 2.5 ug/m³~~	~~CAAQS/SCAQMD Allowable Increase~~
~~PM10[d]~~	~~24-HR (6th highest over 5 years)~~	~~0.065 ug/m³~~	~~96 ug/m³~~	~~96.065 ug/m³~~	~~150 ug/m³~~	~~NAAQS~~
~~PM10~~	~~Annual~~	~~0.118 ug/m³~~	~~35.4 ug/m³~~	~~35.52 ug/m³~~	~~Allowable increase of 1.0 ug/m³~~	~~CAAQS/SCAQMD Allowable Increase~~
~~PM2.5~~	~~24-HR~~	~~1.07 ug/m³~~	~~59.9 ug/m³~~	~~60.97 ug/m³~~	~~Allowable increase of 2.5 ug/m³~~	~~CAAQS/SCAQMD Allowable Increase~~
~~PM2.5~~	~~24-HR (8th highest)~~	~~0.35 ug/m³~~	~~38.0 ug/m³~~	~~38.35 ug/m³~~	~~Below SIL of 1.2 ug/m³~~	~~EPA Significant Impact Level (SIL)~~
~~PM2.5[e]~~	~~Annual~~	~~0.118 ug/m³~~	~~12.38 ug/m³~~	~~12.50 ug/m³~~	~~Below SIL of 0.3 ug/m³~~ ~~Allowable increase of 1.0 ug/m³~~	~~EPA Significant Impact Level (SIL)~~ ~~CAAQS/SCAQMD Allowable Increase~~

~~Pollutant~~	~~Averaging Period~~	~~Project Impact~~	~~Background[a]~~	~~New Ambient~~	~~Limiting Standard~~	~~Type of Standard~~
~~Notes:~~ ~~a. The background values are based on the highest concentrations monitored during 2014 through 2018.~~ ~~b. The NO_2 1-hour modeling was refined using the AERMOD Ambient Ratio Method Version 2 (ARM2) option.~~ ~~c. The NO_2 annual modeling was refined using the AERMOD ARM option, which assumed an 80% conversion factor of NO_x to NO_2.~~ ~~d. The PM10 24-hour modeled values were based on the maximum 6th highest concentration over 5 years period.~~ ~~e. The PM2.5 24-hour modeled values were based on the 8th highest concentration averaged over 5 years period with the background concentrations of 98th percentile of 24-hour data averaged over 5 years period.~~ ~~f. There are receptors surrounding the facility at lower and higher elevations than the emission sources. The model was run on non-default option (flat terrain) on all receptors at lower elevations; and a default option (complex terrain) was selected to on receptors above the emission sources base elevation. The project impact values shown are the highest values from both model runs.~~						

~~Data Source: The output of air dispersion model conducted using Providence BEEST AERMOD software (version 16216r).~~

The values shown in **Table ~~18~~ 15** are the highest pollutants concentration values at any receptors outside the SCLF boundary from operating the proposed ~~electrical generating units~~ RICEs, regenerative flare, and waste flares to combust 135.26 MMBtu/hr LFG ~~at any receptors outside the SCLF boundary~~. The air quality impact analysis methodology and results summarized in **Table 15** included a revised and more conservative SCLF boundary than that assumed in the Draft EIR pursuant with SCAQMD recommendations made during public review of the Draft EIR. These values are below the significance thresholds; therefore, the localized air quality impacts during the operation activities of the proposed Project are expected to be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Less than Significant Impact

Toxic Air Contaminants Health Impacts

4.2.4.5 Toxic Air Contaminant Emissions Impact Due to Earth Moving Activity During Construction Phase

TAC emissions associated with earth moving activity will consist primarily of combustion byproducts from off-road equipment and vehicle trips. Project construction is proposed to take place over a period of 18 months. TAC emissions from construction activity will not have significant health impacts relative to cancer and non-cancer chronic risks because these risks typically occur over continuous exposure for eight to 30 years.

Additionally, the impacts of earth moving activity will typically occur within the Project fence line. The nearest residential and worker receptor is more than 2,200 feet to the east of the emission sources. Therefore, the TAC emission impacts from earth moving activity are expected to be less than significant.

Mitigation Measures

No mitigation measures are required.

4.2.4.6 Toxic Air Contaminant Emission Impacts During Operational Phase

The proposed Project site is located within the boundaries of SCLF in Los Angeles County northwest of the intersection between Ventura Freeway (State Route 134) and State Route 2. The nearest residence is located approximately one-half mile to the east of the proposed Project site. The nearest non-residential sensitive receptors are Dahlia Heights Elementary School, Eagle Rock Montessori School, and California Academy for Liberal Studies Charter Middle School. These schools are located within one mile to the south of the proposed Project site. Toxic pollutant emission concentrations from the proposed Project will disperse substantially before reaching these sensitive receptors.

This section discusses whether the TAC emissions from the proposed Project will have the potential to cause significant public health impacts in the surrounding area. A detailed Tier IV Health Risk Assessment was performed to quantify and assess potential health risk impacts. The Health Risk Assessment modeling was conducted using the air dispersion model (BEEST AERMOD) and the ARB).HARP2

The Health Risk Assessment generally consists of the following steps to estimate health impacts:

- Identify the types and amount of toxic air contaminants generated from the project with consideration of operating profiles, fuel consumption and emission control systems;
- Estimate ground level TAC concentrations at each receptor location using air dispersion modeling;
- Estimate the amount of pollutants to which people could be exposed through inhalation, ingestion, and dermal contact; and
- Characterize the potential health risks by comparing worst-case exposure to safe standards based on known health effects.

4.2.4.7 Toxic Air Contaminant emissions inventory

TAC emissions associated with the proposed Project will consist primarily of combustion byproducts produced by the electrical generating units, regenerative flare, and waste flares. TACs are compounds designated by the California Office of Environmental Health Hazard Assessment (OEHHA) as pollutants that may cause a significant health hazard.

TAC emissions were calculated based on the following parameters:

- Concentrations of TAC compounds are based on the average analysis results of LFG samples taken in the years 2013 to 2015. The Sanitation Districts of Los Angeles County (LACSD) has compiled subsequent emissions and fuel analyses during 2016 through 2018. The subsequent test results indicate a decrease in many toxic pollutants on a lb./MMBtu basis relative to the 2013-2015 analyses. Because the 2016-2018 emission rates and resulting health risks are lower than what was reflected in the initial MND assessment, the more conservative MND values from 2013-2015 were used for this EIR.

- Concentrations of additional TAC compounds are based on the USEPA AP-42, *Chapter 2.4: Municipal Solid Waste Landfills, Table 2.4-1, Default Concentrations of LFG Constituents*.
- Formaldehyde emission factors are obtained from ARB California Air Toxics Emission Factors (CATEF) database (http://www.arb.ca.gov/app/emsinv/catef_form.html) for engines. For flares, the emission factor is based on SCAQMD *Supplemental Instruction for AB2588 Facilities for Reporting Their Quadrennial Air Toxic Emissions Inventory.* The AB2588 emission factors have generally been shown to be more conservative than emission factors that have been measured by LACSD.
- The concentration of organic toxics in the landfill gas will be reduced by the combustion process of the engines. Residual post-combustion organic compounds will be further controlled through the oxidation reaction due to the use of a catalytic converter. The control efficiency of RICE is calculated based on the NMOC destruction efficiency of 86.1 percent for non-halogenated species and 93.0 percent for halogenated species within the collected landfill gas per USEPA AP-42, Chapter 2.4, Table 2.4-3. The catalyst destruction efficiency for post-combustion organic TACs is 97.7 percent, which is the default control efficiency used in the SCAQMD Rule 1401 Calculator.
- An ammonia concentration of 5 ppmv at 15 percent oxygen is based on the SCAQMD BACT determination for a similar project (LFG-fired RICE at Frank R. Bowerman landfill).
- Dioxins and furans compound emissions were included in the analysis as part of the LFG combustion from the regenerative and waste flare systems. Based on several reference documents, such as USEPA AP-42 chapter 2.4, CARB California Air Toxics Emission Factors (CATEF) database search, and SCAQMD AB2588 quadrennial Air Toxics Emission Inventory Procedures dated June 2020, dioxins and furans compounds emissions are not expected to come from internal combustion engines because the proposed engines will be equipped with oxidization catalysts that are designed to destroy organic emissions, including dioxins and furans. However, USEPA AP-42, chapter 2.4 draft report dated October 2008 shows possible dioxin and furans compounds from flares. Therefore, the health risk assessment was updated by including dioxins and furans compounds from the flare systems. The November 2018 source test conducted on the LFG combustion in the boiler at Grayson Power Plant was used to estimate the dioxins and furans emissions for purposes of evaluating potential air quality impacts of the Project. The source test shows an octachlorodibenzo-p-dioxin emission factor of 5.33E-10 lbs./mmcf. While the boilers at Grayson Power Plant and the flares at Scholl Canyon Landfill are not equipped with emissions control systems capable of removing dioxins and furans, as noted above, the reciprocating internal combustion engines proposed for the Project would be equipped with oxidization catalysts that destroy dioxins and furans preventing their release into the atmosphere.

Since Polycyclic aromatic hydrocarbons (PAH) concentrations are not detected in the SCLF gas analysis and the EPAUS AP-42 study on default chemical concentrations for LFG constituents shows no detection on PAH, they are not reflected in the toxic emission inventory. The absence of PAH from the inventory is also in accordance with SCAQMD engineering analyses for similar landfills and consultation with LACSD.

~~As discussed in the previous sections of this report, the MND previously prepared for this Project includes emissions from LFG combustion in the flare system during construction and emissions from LFG combustion in the RICE for the operational phase of the proposed Project. For the analysis considered in this EIR, waste flare operations are included in the construction phase of the proposed Project as well as~~

~~pre-Project operations. **Table 19** summaries the TAC emissions from the RICE during Project operations. **Table 19** also compares Project TAC emissions with TAC emissions from the flare operations that occur as baseline conditions and will continue through the construction phase of the proposed Project. Detailed emission calculations for TACs are provided in Appendix B.4.~~

~~Table 19 TAC Emission Summary – Project~~

~~TAC~~	~~Chemical Abstracts Service # (CAS#)~~	~~Engines (lb./hr.)~~	~~Flares (pre-Project and Construction) (lb./hr.)~~
~~1,1,1 – Trichloroethane~~	~~71-55-6~~	~~3.87E-06~~	~~4.34E-05~~
~~1,1,2,2 – Tetrachloroethane~~	~~79-34-5~~	~~2.57E-04~~	~~2.89E-03~~
~~1,2 – Dibromoethane~~	~~106-93-4~~	~~1.06E-05~~	~~1.19E-04~~
~~1,1 – Dichloroethane~~	~~75-34-3~~	~~5.33E-06~~	~~5.98E-05~~
~~1,1 – Dichloroethene~~	~~75-35-4~~	~~2.54E-06~~	~~2.86E-05~~
~~1,2 – Dichloroethane~~	~~107-06-2~~	~~1.39E-05~~	~~1.56E-04~~
~~1,2 – Dichloropropane~~	~~78-87-5~~	~~2.81E-05~~	~~3.15E-04~~
~~2 – Propanol~~	~~67-63-0~~	~~8.26E-03~~	~~4.67E-02~~
~~Acetonitrile~~	~~75-05-8~~	~~1.06E-04~~	~~5.99E-04~~
~~Acrylonitrile~~	~~107-31-1~~	~~9.21E-04~~	~~5.21E-03~~
~~Ammonia~~	~~7664-41-7~~	~~2.70E-01~~	~~0.00E+00~~
~~Benzene~~	~~71-43-2~~	~~3.66E-04~~	~~2.07E-03~~
~~Benzyl chloride~~	~~100-44-7~~	~~2.27E-05~~	~~2.55E-04~~
~~Carbon disulfide~~	~~75-15-0~~	~~1.21E-04~~	~~6.85E-04~~
~~Carbon tetrachloride~~	~~56-23-5~~	~~4.46E-06~~	~~5.01E-05~~
~~Carbonyl sulfide~~	~~463-58-1~~	~~8.07E-05~~	~~4.56E-04~~
~~Chlorobenzene~~	~~108-90-7~~	~~2.47E-05~~	~~2.77E-04~~
~~Chlorodifluoromethane~~	~~75-45-6~~	~~1.55E-04~~	~~1.74E-03~~
~~Chloroethane~~	~~75-00-3~~	~~1.11E-04~~	~~1.25E-03~~
~~Chloroform~~	~~67-66-3~~	~~3.30E-06~~	~~3.70E-05~~
~~Chloromethane~~	~~74-87-3~~	~~8.44E-05~~	~~9.47E-04~~
~~Dichlorobenzene~~	~~106-46-7~~	~~1.66E-04~~	~~1.87E-03~~
~~Dichlorodifluoromethane~~	~~75-71-8~~	~~2.62E-03~~	~~2.94E-02~~
~~Dichlorofluoromethane~~	~~75-43-4~~	~~3.72E-04~~	~~4.18E-03~~
~~Dichloromethane (methylene chloride)~~	~~74-87-3~~	~~1.40E-05~~	~~1.57E-04~~
~~Ethylbenzene~~	~~100-41-4~~	~~8.00E-04~~	~~4.52E-03~~
~~Ethylene dibromide~~	~~106-93-4~~	~~2.59E-07~~	~~2.91E-06~~
~~Formaldehyde~~	~~50-00-0~~	~~9.85E-03~~	~~3.51E-01~~
~~Fluorotrichloromethane~~	~~75-69-4~~	~~1.44E-04~~	~~1.62E-03~~

~~TAC~~	~~Chemical Abstracts Service # (CAS#)~~	~~Engines (lb./hr.)~~	~~Flares (pre-Project and Construction) (lb./hr.)~~
~~Hexane, n-~~	~~110-54-3~~	~~1.55E-03~~	~~8.78E-03~~
~~Hydrogen chloride~~	~~7647-01-0~~	~~1.78E+00~~	~~1.61E+00~~
~~Hydrogen sulfide~~	~~7783-06-4~~	~~3.15E-03~~	~~1.78E-02~~
~~Mercury (total)~~	~~7439-97-6~~	~~5.03E-05~~	~~4.54E-05~~
~~Methyl ethyl ketone~~	~~78-93-3~~	~~1.40E-03~~	~~7.93E-03~~
~~Methyl isobutyl ketone~~	~~108-10-1~~	~~5.14E-04~~	~~2.90E-03~~
~~Tetrachloroethylene~~	~~127-18-4~~	~~3.53E-05~~	~~3.96E-04~~
~~Toluene~~	~~108-88-3~~	~~1.37E-03~~	~~7.77E-03~~
~~Trichloroethylene~~	~~79-01-6~~	~~1.62E-05~~	~~1.81E-04~~
~~Vinyl chloride~~	~~75-01-4~~	~~8.03E-06~~	~~9.01E-05~~
~~Xylenes~~	~~1330-20-7~~	~~1.41E-03~~	~~7.95E-03~~

~~Note: Some of the toxic emissions were calculated based on AP-42 and CATEF emission factors; and these default emission factors are typically higher than actual emission factors.~~

4.2.4.8 Air Dispersion Modeling of Toxic Air Contaminants Emissions

The AERMOD dispersion model was used to estimate the ground level TAC concentration resulting from the proposed Project. A normalized emission rate of one gram per second was used to model each source. Similar to the air quality impact analysis, a uniform Cartesian receptor grid covering an area of 36 square kilometers (8,900 acres) with 50 meters (164 feet) spacing was used in addition to the identification of discrete fence-line receptors.

4.2.4.9 Health Risk Characterization

The result of the dispersion modeling analysis was imported to HARP2 to determine MICR and non-cancer acute and chronic health risks. As defined in SCAQMD Rule 1401, MICR is the estimated probability of a potential maximally exposed individual contracting cancer as a result of exposure to TAC. Cancer risks were estimated based on 30-year continuous exposure duration for residential and sensitive receptors and a 25-year, five day per week, and eight hours per day exposure duration for worker receptors. Based upon SCAQMD Rule 1401 and the SCAQMD CEQA significance thresholds, a cumulative MICR increase less than ten in a million is considered to be less than significant when Best Available Control Technology for Toxics (T-BACT) is used. For this Project, the proposed RICE and the existing flares are expected to reduce a minimum of 98 percent of NMOC, which represents T-BACT. Additionally, a cancer burden greater than 0.5 excess cancer cases in areas with an incremental increase greater than one in one million individuals is considered to be significant.

To assess acute and chronic non-cancer exposures, annual and one-hour TAC ground-level concentrations are compared with the reference (safe) exposure levels (REL), which is developed by OEHHA. A hazard index (HI) is the ratio of TAC exposure of one hour for acute and long-term level for chronic from the facility to the REL. The total HI is calculated separately for acute and chronic effects. A

total hazard index of less than one is considered to be below significance. Detail MICR and HI for acute and chronic results are provided in Appendix B.5.

4.2.4.10 Maximum Individual Cancer Risk

Table 20 summarizes the maximum MICR values of any (residential ~~and~~ or worker receptors ~~for each operating scenario~~.

Table 20 Maximum MICR Values

~~Equipment~~ Scenario	Max. MICR for any ~~Residential~~ Receptor	~~Max. MICR for Worker Receptor~~	~~CEQA~~ OEHHA and SCAQMD Cancer Risk Significance Threshold	Exceed Significance Threshold?
~~IC Engines[a]~~ Risk to Residential or Worker Receptors Outside Existing Landfill Boundary	~~4.74E-08~~ 0.26E-06	~~3.32E-09~~	10.00E-06	NO
~~Flares (during construction phase)[a,b]~~ Risk to Recreation Users Outside Proposed Power Generation Facility Boundary	~~1.24E-07~~ 7.8E-06	~~1.86E-09~~	10.00E-06	NO

Note:

~~a) The MICR values are the highest values of any receptors outside the landfill boundary. Since the values are already below the significance threshold of 10.00E-06, no further analysis was conducted to obtain readings at the nearest residential or worker receptors.~~

~~b) The cancer risk of the flares was based on 2 years exposure duration for both residential and worker receptors to reflect impact during construction activities.~~

Note: The cancer risk, chronic health index, chronic 8-hour health index, and acute health index values of the proposed Project which were modeled pursuant with Office of Environmental Health Hazard Assessment (OEHHA) Guideline and SCAQMD Risk Assessment Procedures for Rule 1401, 1401.1 and 212. are the highest values of any receptors outside the existing landfill property boundary and power generation facility. Analysis assumes RICEs, regenerative flare, and waste flares combusting 135.26 MMBtu/hr LFG). Since the values are already below the SCAQMD significance threshold of 10E-06 for cancer risk and 1.00 for the health index, no further analysis was conducted to obtain readings at the nearest residential or worker receptors.

Data source: ~~the h~~Health risk assessment conducted in 2021, model output using HARP2

The health risk assessment shows the MICR values of 7.80 in a million at any receptors outside the power generation facility. Since the landfill is expected to be used only for recreational use not residential homes or workers, the MICR values of the Project are expected to be lower than 7.80 in a million.

4.2.4.11 Chronic and Acute Hazard Index

Table 21 summarizes the overall chronic and acute HI values ~~for each operations scenario~~. The acute HI values were calculated for each receptor for the combined impact of all chemicals on target organs.

Table 21 Overall HI Values

	Chronic Hazard Index	Acute Hazard Index		

~~Equipment~~ Scenario	Any Receptor ~~Residential~~ (HIC)	Any Receptor 8-hr ~~Worker (HIC)~~	Any Receptor ~~Residential~~ (HIA)	~~Worker (HIA)~~	~~CEQA~~ OEHHA and SCAQMD Chronic/ Acute Significance Threshold	Exceed Significance Threshold?
~~IC Engines[a]~~ Risk to Residential or Worker Receptors Outside Existing Landfill Boundary	~~9.52E-03~~ 0.016	~~9.52E-03~~ 0.0008	~~2.16E-03~~ 0.0076	~~2.16E-03~~	1.00	NO
~~Flares (during construction phase)[a,b]~~ Risk to Recreation Users Outside Proposed Power Generation Facility Boundary	~~1.22E-03~~ 0.17	~~1.22E-03~~ 0.028	~~1.23E-02~~ 0.26	~~1.23E-02~~	1.00	NO

Note:

~~a) The HIC and HIA values are the highest values of any receptors outside the landfill boundary. Since the values are already below the significance threshold of 1.00, no further analysis was conducted to obtain readings at the nearest residential or worker receptors.~~

Note: The cancer risk, chronic health index, chronic 8-hour health index, and acute health index values of the proposed Project which were modeled pursuant with Office of Environmental Health Hazard Assessment (OEHHA) Guideline and SCAQMD Risk Assessment Procedures for Rule 1401, 1401.1 and 212. are the highest values of any receptors outside the existing landfill property boundary and power generation facility. Analysis assumes RICEs, regenerative flare, and waste flares combusting 135.26 MMBtu/hr LFG). Since the values are already below the SCAQMD significance threshold of 10E-06 for cancer risk and 1.00 for the health index, no further analysis was conducted to obtain readings at the nearest residential or worker receptors

Data source: Health risk assessment conducted in ~~2017~~ 2021, model output using HARP2

As shown in **Table 20** and **21**, MICR, HIC, and HIA values of the proposed Project are below the significance thresholds.

4.2.4.12 Cancer Burden

Pursuant to OEHHA Guideline and SCAQMD policy, if MICR at a representative receptor location is greater than 1.00E-06, an additional analysis must be conducted to determine Cancer Burden (the number of people exposed to a risk of 1.00E-6). As shown in the **Table 20**, the MICR for the proposed Project, even when considering a future recreation use after landfill closure pursuant with requirements of the JPA is less than 1.00E-06; therefore, a Cancer Burden analysis is not required.

Based on the results of health risk assessment shown in **Table 20** and **21**, the toxic emissions from the proposed Project, even when considering a future recreation use after landfill closure pursuant with requirements of the JPA will not expose the nearest sensitive receptors to significance cancer risks, non-cancer acute risks, and non-cancer chronic risks. Additional mitigation measures are not required.

Threshold: Expose sensitive receptors to substantial pollutant concentrations?

Mitigation Measures

No mitigation measures are required.

4.2.4.13 Carbon Monoxide Hotspots

The proposed Project would include a similar number of vehicle trips that already exists as part of operation and maintenance of the LFG collection, conditioning, and flaring operations. Because the proposed Project would not result in an increase in operation phase vehicle trips, there would be no increase in vehicle CO emissions that would have the potential to result in a carbon monoxide. CO emissions during construction activity will be below SCAQMD localized significant impact thresholds. As a result, the potential impact relative to CO hotspots of construction and operation of the Project would not be significant

Mitigation Measures

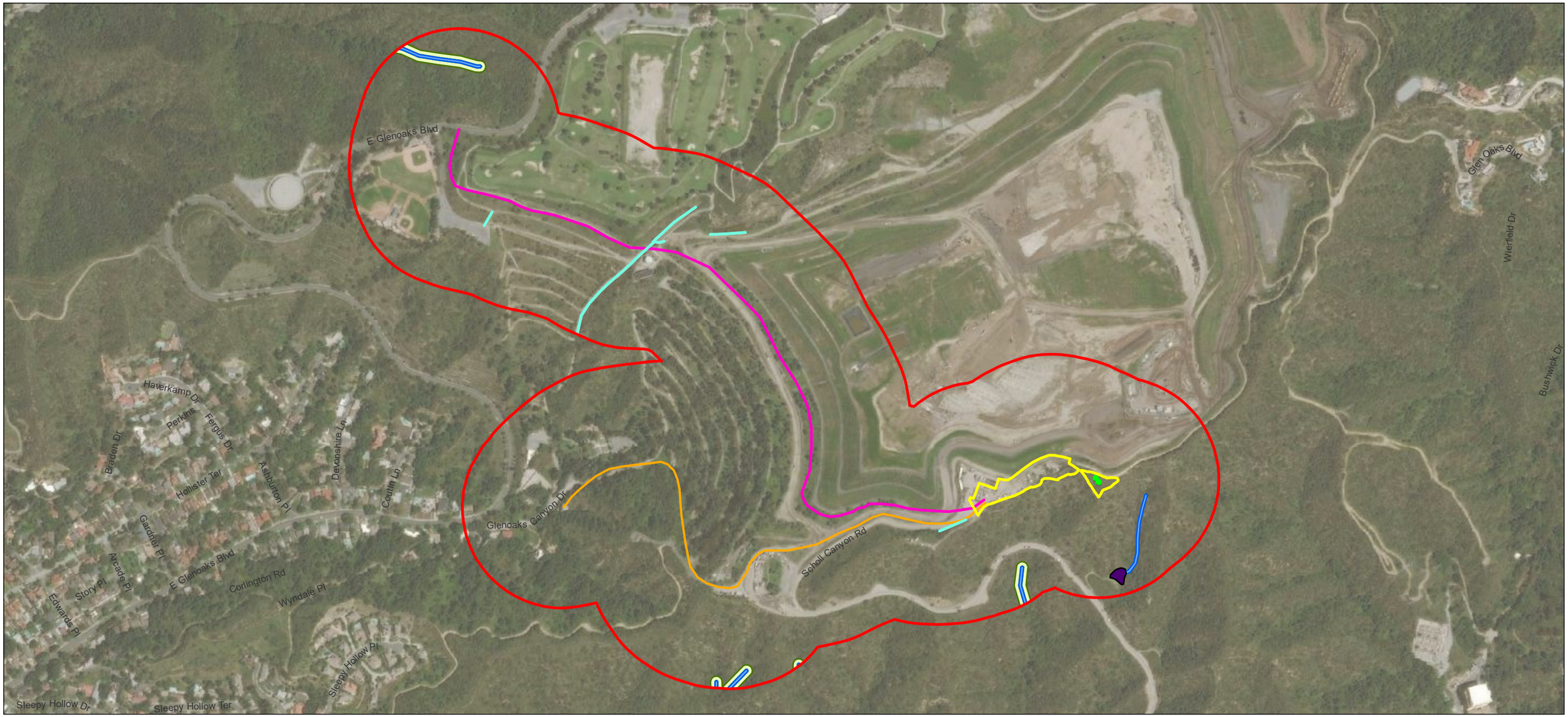
No mitigation measures are required.

4.2.5 Cumulative Impacts

One local project has been determined to be a related project as defined by CEQA Guidelines 15130(b). The Grayson Repowering Project, which is located approximately five miles west of the SCLF. Extensive analyses of each project were conducted to assess the significance of air quality, public health and greenhouse gas impacts. Each project was independently determined to present impacts that are below significance thresholds.

The Grayson Repowering Project EIR is being amended to reflect an alternative project design, including a smaller fossil fuel -based generating platform that will be augmented with distributed renewable generation and a minimum of 50 MW of battery storage capacity. The environmental impacts of the alternative design of the Grayson Repowering Project are also expected to be less than significant. Given the distance between the two projects and level of impact from each project, it is reasonable to conclude that the combined impact of the two projects would also be less than significant.

As shown in the analysis above, the Project's potential air quality impacts, even when considering a future recreation use after landfill closure pursuant with requirements of the JPA would be less than significant.



Biological Study Area

Potentially Jurisdictional Drainage Features

Project Components

Proposed Power Plant Facility Boundary

Proposed Water Pipeline

Proposed Gas Pipeline

New Water Tank

National Wetlands Inventory - Wetland

Freshwater Pond

Riverine

National Wetlands Inventory - Riparian

Forested/Shrub Riparian

0 600 1,200 Feet

(At original document size of 11x17)
1:7,200

N

Stantec

Project Location
Glendale, Ca

Prepared by DL on 2021-07-14
TR by SET on 2021-07-14
IR by SR on 2021-07-14

Client/Project 185804356

City of Glendale Water and Power
Biogas Renewable Generation Project
Environmental Impact Report

Figure No.
4.3-2

Title
National Wetlands Inventory

Notes
1. Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet
2. Background: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community
3. S=Data Source: Stantec, Wetlands and Riparian from National Wetlands Inventory 2020.

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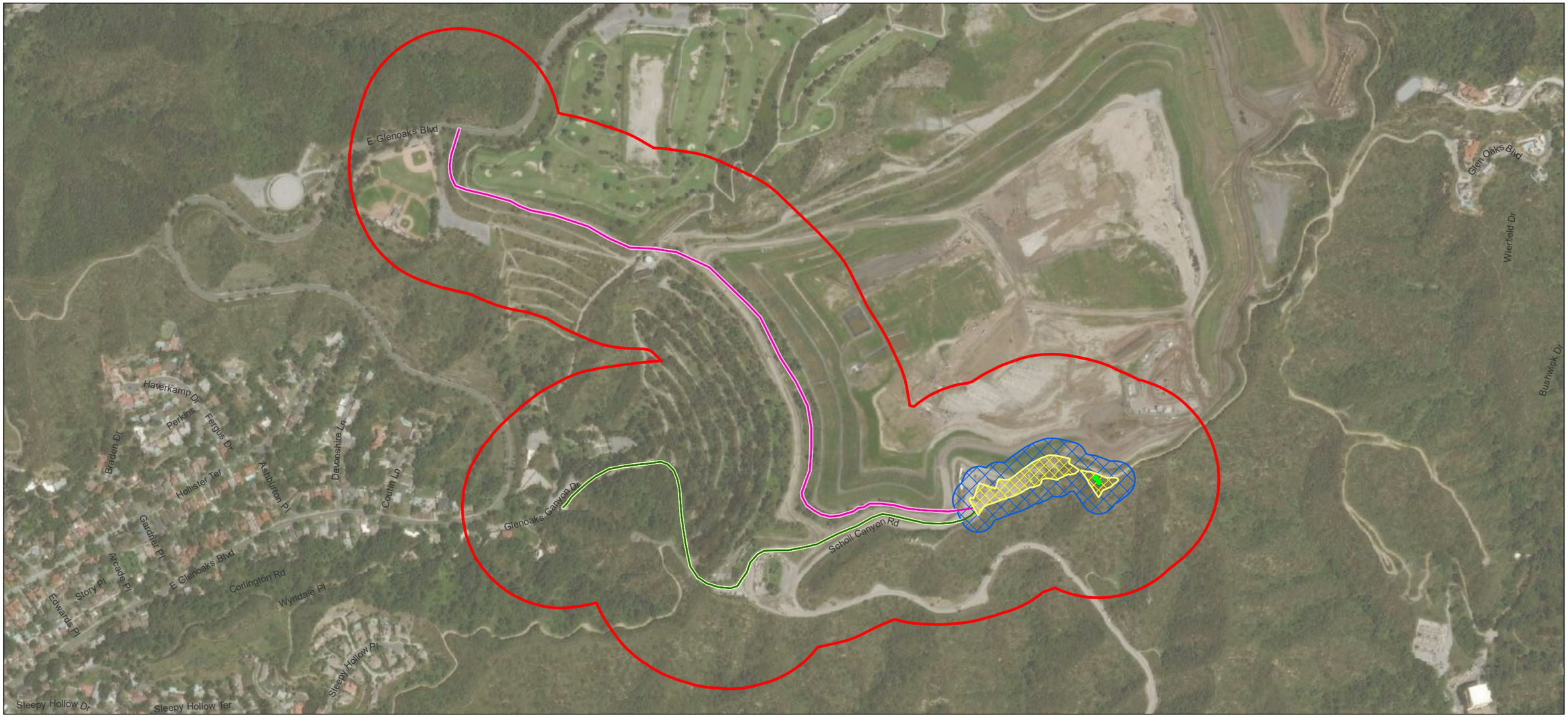

Biological Study Area

New Water Tank

Proposed Power Plant Facility Boundary (Permanent Impact)

Proposed Power Plant Facility 100ft Buffer For Fire Protection (Permanent Impact)

Proposed Water Pipeline (Permanent Impact)

Proposed Water Pipeline (Temporary Impact)

Proposed Natural Gas Pipeline (Permanent Impact)

Proposed Natural Gas Pipeline (Temporary Impact)

0 600 1,200 Feet

(At original document size of 11x17)
1:7,200

N

Stantec

Project Location
Glendale, Ca

Prepared by DL on 2021-07-14
TR by SET on 2021-07-14
IR by SR on 2021-07-14

Client/Project 185804356

City of Glendale Water and Power
Biogas Renewable Generation Project
Environmental Impact Report

Figure No.
4.3-3

Title
Limits of Temporary and Permanent Impacts

Notes
1. Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet
2. Background: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

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Monitoring will occur continuously during initial ground disturbance for the duration of construction~~. Once initial ground disturbance is complete, monitoring will occur periodically during all construction~~ activities. Once initial ground disturbance is complete, monitoring will occur periodically during all construction activities within these areas. Activities related to the installation of the gas and water pipelines should be monitored daily for the duration of construction (not just initial ground disturbance). The qualified biologist(s) shall be present at all times during ground-disturbing activities immediately adjacent to, or within, habitat that supports populations of listed or special-status species. Any special-status plants shall be flagged for avoidance. Any special-status terrestrial species found within a Project impact area shall be relocated by the authorized biologist to suitable habitat outside the impact area; relocation will be guided by the species specific list (or plan) as described further below in this measure. Surveys for special-status species shall be conducted by the authorized biologist prior to the initiation of construction each day ~~during initial ground disturbance, and weekly thereafter~~ prior to Project construction activities. Pre-construction clearance surveys should be conducted within the entirety of Project site. If nesting birds are found during the pre-construction surveys, buffers shall be installed (as prescribed in Mitigation Measure BIO-5 Conduct Pre-construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures discussed below.

If, during construction, the biological monitor observes a dead or injured special-status wildlife species on the construction-site; the City of Glendale, CDFW, and USFWS (as appropriate) should be notified by the end of the work day or the following morning if the required agency office is closed. ~~a~~A written report shall be sent to the City of Glendale, CDFW, and USFWS (as appropriate) within ~~five~~ three calendar days. The report will include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Injured animals will be taken immediately to the nearest appropriate veterinary or wildlife rehabilitation facility. The biological monitor shall, immediately upon finding the remains or injured animal, coordinate with the onsite construction foreman to discuss the events that caused the mortality or injury, if known, and implement measures to prevent future incidents. Details of these measures shall be included with the report. Work in the immediate area may only resume once the proper notifications have been made and additional measures have been identified to prevent additional injury or death. Species remains shall be collected and frozen as soon as possible, and CDFW and USFWS, as appropriate, shall be contacted regarding ultimate disposal of the remains.

A qualified biologist should prepare a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas. The list (or plan) of protocols should be implemented during Project construction and activities/biological construction monitoring. The qualified biologist, in coordination or on behalf of the City, may consult with CDFW to prepare species-specific protocols for proper handling and relocation procedures.

BIO-4 Conduct Pre-construction Floristic Plant Surveys

The City shall conduct two appropriately timed floristic surveys, following current CDFW and CNPS protocols, within the Project impact areas and within a 100-foot buffer in the spring/summer prior to the start of construction. Upon completion of the surveys a detailed report will be prepared and provided to

Project activities that result in the degradation to habitat for or the loss of endangered, threatened, or other special-status species would be considered a significant adverse impact requiring mitigation.

Special Status Mammals

No special-status mammal species were detected within proposed Project impact areas. The proposed Project area and adjacent habitats have the potential to support a variety of special-status mammals including the American badger and the San Diego desert woodrat, both CDFW Species of Special Concern. Direct impacts to these species would include mechanical crushing by vehicles and construction equipment, trampling, and loss of habitat. Construction disturbance can also result in the flushing of small animals from refugia which increases the predation risk for small rodents. Potential indirect impacts include exposure to fugitive dust, alteration of soils, such as compaction, that could preclude burrowing, the spread of exotic weeds, and increased noise levels.

During O&M of the proposed Project, impacts to sensitive mammals would include increased human disturbance, exposure to fugitive dust, the spread of noxious weeds, and disruption of breeding or foraging activity due to routine inspection and maintenance activities. Weed abatement through herbicide application or mechanized tools could also affect mammal species.

Because the proposed Project would remove or disturb vegetation and these animals would be subject to mortality from the construction of the proposed Project, impacts to these species would be considered significant adverse effects requiring mitigation.

Mitigation Measures

BIO-1 Implement a Worker Environmental Education Program

BIO-2 Implement Best Management Practices (BMPs)

BIO-3 Implement Biological Construction Monitoring

BIO-5 Conduct Pre-construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures

If feasible, conduct initial vegetation removal and construction activities that generate substantial noise and/or dust outside of the recognized nesting bird season to minimize potential direct impacts to nesting birds. Text will also be included that recommends construction activities resulting in a significant increase in noise or dust, based on baseline levels, will be conducted outside of the nesting season to the extent feasible.

Prior to construction activities during the recognized nesting bird season (i.e., mobilization, staging, grading, or construction) the City of Glendale shall retain a qualified avian biologist to conduct pre-construction surveys for nesting birds within the recognized breeding season in all areas within 500 feet of all proposed Project components (i.e., pipelines, staging areas, and access road locations). Surveys for raptors shall be conducted for all areas from January 1 to August 15. The required survey dates may be modified based on local conditions, as determined by the qualified avian biologist, in

BIO-6 Conduct Surveys for Terrestrial Herpetofauna and Implement Monitoring, Avoidance, and Minimization Measures

Prior to ground disturbance or vegetation clearing at all Project locations, the City of Glendale shall retain a qualified biologist to conduct surveys for terrestrial herpetofauna where suitable habitat is present and directly impacted by construction vehicle access. Surveys should place an emphasis towards identifying any Species of Special Concern (SSC) including (but not limited to) the southern California legless lizard; California glossy snake; coastal whiptail; coast horned lizard; and San Diego desert woodrat. Focused surveys shall consist of a minimum of three daytime surveys and one nighttime survey within one week of vegetation clearing. The qualified biologist will be present full time during all vegetation removal activities immediately adjacent to or within habitat that supports terrestrial herpetofauna, and part time for all remaining activities. Surveys for terrestrial herpetofauna shall be conducted by the qualified biologist prior to the initiation of each day of vegetation removal activities in suitable habitat. Terrestrial herpetofauna found within the area of disturbance or potentially affected by the proposed Project will be relocated to the nearest suitable habitat that will not be affected by the proposed Project.

BIO-7A Conduct Pre-Construction Maternity Colony or Hibernaculum Surveys for Sensitive Bats

No more than 15 days prior to Project construction activities near trees, or which involve removal of trees or other structures, the City shall retain a qualified biologist who has a CDFW collection permit and a Memorandum of Understanding with CDFW allowing the biologist to handle bats. That biologist shall conduct pre-construction surveys for sensitive bats. Surveys shall also be conducted during the maternity season (1 March to 30 September) within 100 feet of Project activities.

If active maternity roosts or hibernacula are found, the structure, tree or tower occupied by the roost shall be avoided (i.e., not removed), if feasible; work shall not occur within 100 feet of or directly under or adjacent to an active roost and work shall not occur between 30 minutes before sunset and 30 minutes after sunrise. If avoidance of the maternity roost is not feasible, the biologist shall survey (through the use of radio telemetry or other CDFW methods) for nearby alternative bat maternity colony sites. If the biologist determines in consultation with the CDFG that there are alternative roost sites used by the maternity colony and young are not present then no further action is required, and it will not be necessary to provide alternate roosting habitat. If there are no alternative roosts sites used by the maternity colony, BIO-7B is required. If no active roosts are found, then no further action is required. If active maternity roosts are absent, but a hibernaculum (i.e., a non-maternity roost) is present, then BIO-7B is not necessary, but BIO-7C is required.

BIO-7B Provide Substitute Roosting Habitat for Bats

If a maternity roost will be impacted by the Project, and no alternative maternity roosts are in use near the site, substitute roosting habitat for the maternity colony shall be provided on, or in close proximity to, the Project site no less than three months prior to the eviction of the colony. Alternative roost sites will be constructed in accordance with the specific bat requirements in coordination with CDFW. By making the roosting habitat available prior to eviction (BIO-7C), the colony will have a better chance of finding and using the roost. Alternative roost sites must be of comparable size and proximal in location to the impacted colony. The CDFW shall also be notified of any hibernacula or active nurseries within the construction zone.

If construction of alternative roost sites is required, the biologist shall provide a written report, documenting the required coordination with CDFW as well as the location of roost sites. This report shall be provided to CDFW.

BIO-7C Exclude Bats Prior to Eviction from Roosts

If non-breeding bat hibernacula are found (for the duration of construction activities) in structures or trees scheduled to be removed, the individuals shall be safely evicted, under the direction of a qualified biologist, by opening the roosting area to allow airflow through the cavity or other means determined appropriate by the bat biologist (e.g., installation of one-way doors). In situations requiring one-way doors, a minimum of one week shall pass after doors are installed and temperatures should be sufficiently warm for bats to exit the roost because bats do not typically leave their roost daily during winter months in southern coastal California. This action should allow all bats to leave during the course of one week. Roosts that need to be removed in situations where, in the judgment of the qualified biologist, the use of one-way doors is not necessary shall first be disturbed by various means at the direction of the bat biologist at dusk to allow bats to escape during the darker hours, and the roost tree shall be removed or the grading shall occur the next day (i.e., there shall be no less or more than one night between initial disturbance and the grading or tree removal).

If an active maternity roost is located in an area to be impacted by the Project, and alternative roosting habitat is available, the demolition of the roost site must commence before maternity colonies form (i.e., prior to March 1st) or after young are flying (i.e., after July 31st) using the exclusion techniques described above.

Level of Significance After Mitigation

To reduce impacts to special-status wildlife, the City of Glendale would implement Mitigation Measures BIO-1 (Implement a Worker Environmental Education Program), BIO-2 (Implement Best Management Practices), BIO-3 (Implement Biological Construction Monitoring), BIO-5 (Conduct Pre-construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures), ~~and~~ BIO-6 (Conduct Surveys for Terrestrial Herpetofauna and Implement Monitoring, Avoidance, and Minimization Measures), BIO-7A (Conduct Pre-Construction Maternity Colony or Hibernaculum Surveys for Sensitive Bats), BIO-7B (Provide Substitute Roosting Habitat for Bats), and BIO-7C Exclude Bats Prior to Eviction from Roosts). These measures include worker education describing the sensitive biological resources that occur on the proposed Project site, implementation of BMPs to minimize and avoid impacts, conducting pre-construction nesting bird and herpetofauna surveys, and conducting biological monitoring during

Table 25 Proposed Project Impacts to Vegetation Communities and Land Cover Types

Vegetation Community / Land Cover Type		Total Acres in Survey Area			Project Impacts			
2019 Survey	2017 Survey	2019 Survey (Acres)	2017 Survey (Acres)	2019 Survey (Acres)*			2017 Survey (Acres)	
				Temp	Perm		Temp	Perm
					Power Plant, Water Tanks, and Pipeline	Fire/Brush Clearance		
Annual Brome Grassland	--	10.48	--	0.22	0.15	0.65	--	--
Black Sage Scrub	California Encelia-Black Sage Scrub	8.0	5.67	--	--		--	--
California Buckwheat Scrub	--	1.75	--	--	--		--	--
California Sagebrush Scrub	California Sagebrush Scrub	0.44	0.31	--	--		--	--
California Sagebrush-California Buckwheat Scrub	California Buckwheat Scrub	2.84	7.11	--	0.16	0.06	0.02	0.29
Chamise chaparral	Scrub Oak - Chamise Chaparral	4.82	2.40	--	--		--	--
Coast live oak woodland	Coast live oak woodland	2.95	1.3	0.00	--		--	--
Fountain Grass Swards	--	14.49	--	0.34	0.03		--	--
Laurel Sumac Scrub	Lauren Sumac Chamise Scrub	70.57	50	0.16	0.45	2.76	0.09	0.39
Developed / Disturbed	Cleared / Developed	~~87.18~~ 87.16	86.75	0.91	1.39	2.33	1.13	1.45
Ornamental Woodland	Ornamental/ Non- Native	31.75	39.14	0.42	~~0.03~~ 0.05		0.92	0.06
	Total	**~~235.27~~ 235.25**	**192.68**	**2.06**	**~~8.01~~ 2.22**	**5.80**	**2.16**	**2.19**

*These acreages include impacts related to updated Fire Department brush clearance requirements not required as part of the 2017 impact acreage calculations.

Construction of the proposed Project would remove vegetation, alter soil conditions, and potentially result in the loss of native seed banks. Construction activities could also result in the spread of noxious weeds

within the proposed Project site and adjacent habitats. Vehicle travel on access roads and paved streets could result in increased fugitive dust to native vegetation in adjacent areas. Wind-blown dust can degrade soils and vegetation over a wide area (Okin et al., 2001). Dust can have deleterious physiological effects on plants and may affect their productivity and nutritional qualities (Sharifi et al., 1997). Fugitive dust can kill plants by burial and abrasion, interrupt natural processes of nutrient accumulation, and allow the loss of soil resources. The destruction of plants and soil crusts by windblown dust exacerbates the erodibility of soil and accelerates the loss of nutrients (Okin et al., 2001).

Operational impacts would occur during routine inspection and maintenance of the proposed Project components. These impacts could include trampling or crushing of native vegetation by foot traffic, alterations in topography and hydrology, increased erosion and sedimentation, and the introduction of non-native, invasive plants due to increased human presence on foot or equipment.

While not considered a sensitive community for the purposes of CEQA, coast live oak and scrub oak are protected under the City of Glendale's "Indigenous Tree Ordinance." Depending on the dbh of the impacted trees a permit and replacement trees may be required. The City of Glendale would be required to seek a permit for impacts to protected trees to comply with the "Indigenous Tree Ordinance."

Because of their suitability to support several special-status species, the loss of and impacts to native habitat associated with the proposed Project would be considered a significant adverse impact for which mitigation would be required (Class II).

Mitigation Measures

BIO-1 Implement a Worker Environmental Education Program

BIO-2 Implement Best Management Practices (BMPs)

BIO-3 Implement Biological Construction Monitoring

~~BIO-~~7 BIO -8 Vegetation Removal and Replacement

Construction activities shall be done in such a manner as to minimize the removal of native vegetation. If impacts to native vegetation removal cannot be avoided, all temporarily impacted plant communities shall be restored at a mitigation ratio of 1:1; the Project will temporarily impact 0.16 acres of California sagebrush-California buckwheat scrub and 0.45 acres of laurel sumac scrub. ~~permanent impacts to native communities shall be restored/mitigated at a 2:1 ratio. Sensitive communities, including jurisdictional wetlands, shall be restored/replaced at a mitigation ration of 2:1 for all temporary and 3:1 for all permanent impacts.~~ The compensation for the permanent loss of habitats may be achieved either by a) on-site habitat creation or enhancement of impacted communities with similar species compositions to those present prior to construction, b) off-site creation or enhancement of ~~California sycamore woodlands and southern riparian scrub~~ laurel sumac scrub and California sagebrush-California buckwheat scrub communities, or c) participation in an established mitigation bank program. Permanent impacts to native communities shall be restored/mitigated at a 3:1 ratio for on or off-site habitat restoration/creation or at a 2:1 ratio for participation in an established mitigation banking program; the Project will permanently

impact 0.06 acres of California sagebrush-California buckwheat scrub and 2.76 acres of laurel sumac scrub.

~~Prior to the removal of native vegetation, if on or off-site mitigation is required, a Habitat Mitigation and Monitoring Plan shall be prepared that will guide all restoration and monitoring activities. This plan shall include, at a minimum, the~~ following:

Prior to the start of any project related activities (including removal of native vegetation), if on or off-site mitigation is required, an ecosystem-based Habitat Mitigation and Monitoring Plan shall be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques that will guide all restoration and monitoring activities. This plan shall include, at a minimum, the following:

- Provide the total acreage of unique sensitive vegetation communities impacted, and abundance, density, and cover of each plant species and vegetation layer impacted (i.e. ground cover, forbs, subshrub, shrub, and trees).
- Provide the specific location of on- and/or off-site mitigation area(s) and a science based factual discussion as to why the mitigation area(s) is appropriate for mitigating Project-related impacts. Describe the environmental features (i.e., soils, slope, existing vegetation, hydrology) that would suggest the mitigation area(s) can support the vegetation and wildlife impacted by Project activities.
- Provide a vegetation survey conducted at a reference site containing the vegetation communities being mitigated, with as good or better quality habitat, to document the density, abundance, diversity, and percent cover for each species by vegetation layer.
- A schematic depicting the mitigation area
- Proposed species list for creation/enhancement~~;~~ A plant palette shall consist of species that are diverse with respect to growing duration (annual, perennial), life form (grasses, shrubs, trees, vines), and structure (ground cover, shrubs, tree canopy) that form the vegetation alliance that is being mitigated.
- Planting/seeding methodology~~;~~ (e.g., sources of local propagules, container sizes, and seeding rates).
- Planting schedule.
- Irrigation plan~~;~~.
- Weeding schedule~~;~~ and invasive plant control methods that reduces or eliminates the use of chemicals.
- Success criteria~~;~~.
- Monitoring methodology and schedule~~; and~~ extended across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.
- Reporting requirements.
- Prior to any Project construction and activities, the perimeter of the 3.37 acres of laurel sumac scrub and California sagebrush-California buckwheat scrub be clearly delineated by temporary stakes, flags, or other clearly identifiable system. Fencing will be accompanied by signage. During WEAP, workers will be advised not to cut, clear, pull, or trample vegetation; toss or pile debris and garbage; or otherwise impact vegetation beyond the demarcated area. Temporary

fencing and signage should be maintained for the duration of the Project and removed after Project construction and activities are completed.

Level of Significance After Mitigation

Implementation of Mitigation Measures BIO-1 (*Implement a Worker Environmental Education Program*), BIO-2 (*Implement Best Management Practices*), BIO-3 (*Implement Biological Construction Monitoring*), and ~~BIO-7~~ BIO-8 (*Vegetation Removal and Replacement*) would minimize impacts to sensitive or protected communities. These measures include worker education describing the sensitive biological resources that occur on the proposed Project site, implementation of BMPs to minimize and avoid impacts, and conducting biological monitoring during ground- disturbing and other construction-related activities. Implementation of these mitigation measures would reduce impacts to listed or special-status plants to a less than significant level.

Threshold: Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

A formal delineation of jurisdictional wetlands, other “waters of the U.S.,” waters of the State, and CDFW jurisdictional waters was not conducted; however, during reconnaissance level surveys potentially jurisdictional features were mapped and are presented on Figure 3 in Appendix C of this document. The project has been designed such that all gas and water pipelines would be installed overhead or below all potentially jurisdictional features.

Should they occur, direct impacts to federal non-wetland Waters of the U.S. and CDFW jurisdictional waters could include the removal of native vegetation, the discharge of fill, degradation of water quality, and increased erosion and sediment transport. Potential indirect impacts could include alterations to the existing topographical and hydrological conditions and the introduction of non-native, invasive plant species. Operational impacts to wetland habitats would be similar to direct and potential indirect impacts.

As required by law, the City would comply with the regulations regarding conducting Project activities in water courses and habitats under the jurisdiction of the State and federal government. Therefore, the City would obtain required permits pursuant to Section 401 and 404 of the CWA, the State Porter- Cologne Act, and Fish and Game Code Section 1605. Due to the importance of jurisdictional habitats and ephemeral/perennial drainages and their suitability to support special-status species, the loss of these habitats associated with the proposed Project would be considered a significant adverse impact requiring mitigation.

Mitigation Measures

BIO-1 Implement a Worker Environmental Education Program

BIO-2 Implement Best Management Practices (BMPs)

BIO-3 Implement Biological Construction Monitoring

Level of Significance After Mitigation

emissions to be amortized over a 30-year project lifespan. For this analysis, however, construction emissions reflect the project total, without amortization. GHG due to Project operations include emissions from both stationary and mobile sources.

4.6.4 Project Impacts

Threshold: Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

The proposed Project will emit GHG emissions from construction and operation activities. The construction GHG emissions would be generated primarily by the off-road equipment and on-road vehicles.

During the operations phase of the proposed Project, the electrical generation units, regeneration flare, and waste flares will be the primary contributor of GHG emissions. ~~LFG will be transferred from the existing flare operations to electrical generating units with the exception of periods when the system is under maintenance or repair. During these periods, the existing flares will serve as backup devices.~~ Facility occupancy related activity, such as water usage, power usage, and vehicles will also generate a small level of GHG emissions.

CalEEMod was used to calculate GHG emissions from the construction and facility occupancy activities. USEPA emission factors and an estimated LFG production rate of ~~5,000~~ 6,200 scfm were used to calculate GHG emissions from the proposed electrical generating equipment. CalEEMod results are provided in Appendix B.

~~Additionally, natural gas (NG) may be utilized to augment ignition when the LFG heating value is unusually low. GHG emissions from NG combustion were calculated.~~ **Tables 29** and **30** summarizes the potential net increase of GHG emissions that could occur during construction and operation of the proposed Project. A GHG emission inventory is provided in Appendix F.

Table 29 Net Increase of GHG Emissions from the Construction Activities

Device/Activity	CO_2 (MT/year)	CH_4 (MT/year)	N_2O (MT/year)	Total CO_2e (MT/year)
Construction	257	0.06	0	258

Table 30 Net Increase of GHG Emissions from the Operation Activities

Device/Activity	CO_2 (MT/year)	CH_4 (MT/year)	N_2O (MT/year)	Total CO_2e (MT/year)
Proposed ~~Engines~~ Project	~~48,146~~ 61,696	~~2.76~~ 3.79	~~0.53~~ 0.75	~~48,375~~ 62,013
Occupants	49	~~0.13~~ 0.12	~~1.29×10^{-3}~~ 0.001	52
			Total GHG Emissions:	~~48,427~~ 62,065
			Total Baseline GHG Emissions:	~~43,621~~ 62,013
			Net Increase of GHG Emissions:	~~4,806~~ 52

Level of Significance After Mitigation

As discussed above, baseline wildfire risks would be not be exacerbated and significant risk of loss, injury or death involving wildland fires was unlikely to occur during construction of the proposed Project. Project design features, existing regulatory requirements, and implementation of Mitigation Measures FIRE-1, FIRE-2, and FIRE-3 would serve to ensure that the operation of the proposed Project would not result in an increased baseline risk exposure. Therefore, impacts would be less than significant.

4.7.4.6 Operation

Described in detail in Section 4.14 (Wildfire), operational impacts associated with exacerbated wildfire risks and significant risk of loss, injury or death involving wildland fires could occur if operation of the proposed Project would result in an increased baseline wildfire risk or generate increased unmitigated sources of ignition. Significant risks would be generated only if operation of the proposed Project were to result in a wildland fire which originated within the proposed Project, and then spread offsite into the surrounding San Rafael Hills. The Project does not propose any habitable structures or residences which could become threatened by fires originating onsite during operation of the proposed Project.

As discussed in Section 2.7 (Project Operations), the proposed Project would be operated adjacent to the existing LFG collection and LFG flaring systems. The blowers and flares would remain pursuant to the existing SCAQMD permit. After the proposed Project is in operation, the flares would only be used as required during power generation facility maintenance or in the unlikely event that there is excess LFG being produced that cannot be used for generating electricity. Fuel (vegetation) management would occur regularly in accordance with regulations. The electrical generating combustion engines would be operated within fire protection enclosures with fire suppression systems, and electrical equipment would be operated in enclosures insulated with an inert gas, thereby further reducing potential sources of ignition. The existing flares would remain and do not represent a new source of potential wildfire or an increase above the baseline wildfire risk. Discussed in Section 4.14.4.2, implementation of Mitigation Measure ~~FIRE-4~~ FIRE-1 ~~(Firefighting Tools)~~ (Fire Protection Plan) would ensure that an abundance of fire protection capabilities remain on-site at all times and that on-site personnel can immediately respond in the event of an unforeseen circumstance. Implementation of Mitigation Measure FIRE-1 is also warranted, as it would also further reduce risk of wildfire during Project operation.

Mitigation Measures

FIRE-1: Fire Protection Plan

~~*FIRE-4: Firefighting Tools*~~

Level of Significance After Mitigation

As discussed above, baseline wildfire risks would be not be exacerbated and significant risk of loss, injury or death involving wildland fires was unlikely to occur during operation of the proposed Project. Project design features, existing regulatory requirements, and implementation of Mitigation Measure~~s~~ FIRE-1 ~~and FIRE-4~~ would serve to ensure that the operation of the proposed Project would not result in an increased baseline risk exposure. Therefore, impacts would be less than significant.

Table 55 Comparison of Alternatives

		Alternative 1 No Project	Alternative 2 Convert Landfill Gas to Natural Gas	Alternative 3 Convert Landfill Gas to Liquid Natural Gas	Alternative 4 Locate Engine Generators at an Another Location
Ability to Meet Project Objective					
Would the alternative provide beneficial use of naturally occurring LFG?		No	Yes	Yes	Yes
Environmental Factor	**Project Impacts**	**Comparison of Potential Environmental Impacts to Project**			
Aesthetics	Less than Significant Impact	Less	Less	Greater	Less
Agriculture & Forestry Resources	No Impact	Similar	Similar	Similar	Similar
Air Quality	Less than Significant Impact	Less	Less	Less	Greater
Biological Resources	Less than Significant Impact with Mitigation	Less	Similar	Greater	Less
Cultural Resources	No Impact	Similar	Similar	Similar	Similar
Energy	Less than Significant Impact	Greater	Greater	Greater	Greater
Geology & Soils	Less than Significant Impact	Less	Greater	Greater	Similar
Greenhouse Gas Emissions	Less than Significant Impact	Greater	Less	Less	Greater
Hazards & Hazardous Materials	Less than Significant Impact	Less	Greater	Greater	Greater
Hydrology & Water Quality	Less than Significant Impact	Less	Greater	Greater	Similar
Land Use and Planning	Less than Significant Impact	Less	Greater	Greater	Less
Mineral Resources	No Impact	Similar	Similar	Similar	Similar
Noise	Less than Significant Impact	Less	Less	Similar	Greater
Population & Housing	No Impact	Similar	Similar	Similar	Similar
Public Services	No Impact	Similar	Similar	Similar	Similar
Recreation	No Impact	Similar	Similar	Similar	Similar
Transportation and Traffic	Less than Significant Impact	Less	Greater	~~Similar~~ Greater	Similar
Tribal Cultural Resources	Less than Significant Impact	Similar	Similar	Similar	Similar

		Alternative 1 No Project	Alternative 2 Convert Landfill Gas to Natural Gas	Alternative 3 Convert Landfill Gas to Liquid Natural Gas	Alternative 4 Locate Engine Generators at an Another Location
Utilities and Service Systems	Less than Significant Impact	Similar	Similar	Similar	Similar
Wildfire	Less than Significant Impact with Mitigation	Similar	Less	Greater	Less

5.6.6 Identification of the Environmentally Superior Alternative

CEQA requires that an EIR identify the environmentally superior alternative(s) of a project other than the proposed project or the "no project" alternative (CEQA Guidelines Section 15126.6 (e)(2)) if the no project alternative is the environmental superior. As stated at the beginning of this chapter, the purpose of this alternatives analysis is to consider a reasonable range of alternatives that could feasibly attain the basic project objective and avoid or substantially lessen significant project impacts.

The No Project Alternative would not satisfactorily meet the proposed Project objective.

As shown above in **Table 55**, the proposed Project, prior to incorporating mitigation, has the potential to significantly impact biological resources and wildfire. Of the alternatives considered in this evaluation, Alternative 4 is the only alternative that would reduce or avoid the potentially significant environmental effects of the proposed Project in the areas of biological resources and wildfire. However, placing the engine generators at Grayson Power Plant and significantly closer to sensitive and residential receptors would increase health risks and noise levels compared to the proposed Project. Additionally, an increase in energy use, indirect greenhouse gas emissions, and risk of upset/hazards from continued use of the SCLF to Grayson Power Plant pipeline would result compared to the proposed Project.

Alternative 2 would have incrementally less impacts to five environmental factors and incrementally greater impacts to six environmental factors compared to the proposed Project. Alternative 3 would have incrementally greater impacts to ~~eight~~ nine environmental factors and incrementally less impacts to two environmental factors when compared to the proposed Project. Alternative 4 would have incrementally greater impacts to five environmental factors and incrementally less impacts to four environmental factors when compared to the proposed Project.

As a result of this analysis, Alternative 2 is the environmentally superior alternative because it would reduce more proposed Project impacts when compared to the other alternatives. These include reductions in impacts to aesthetics, air quality, noise, greenhouse gas emissions and wildfire risk. Alternative 2 impacts on biological resources is similar to the proposed Project. Alternative 2 decreases more impacts compared to the proposed Project and also when compared to the other alternatives. Alternative 4 would have greater impacts on greenhouse gas emissions, air quality and noise in closer proximity to residential uses and sensitive receptors when compared to the proposed Project and to

7.0 REFERENCES

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9.0 RESPONSE TO COMMENTS

9.1 SUMMARY OF WRITTEN COMMENTS RECEIVED DURING THE PUBLIC REVIEW PROCESS FOR THE DRAFT EIR

The City as Lead Agency has prepared responses to comments received during public review of the Draft Environmental Impact Report (Draft EIR) pursuant to (Pub Res C section 21091(d); 14 Cal Code Regs section 15088. The responses to each comment, and where appropriate, provides information that amplifies and or clarifies information contained in the Draft EIR.

All written comments and responses to those comments on the Draft EIR received during the public review period (July 1, 2020, through September 30, 2020) are included in this section. The comment letters are all provided at the end of this section, followed by responses to all the comments. Comment letters were received from individual agencies, businesses, groups, organizations, and members of the general public. Comment letters are numbered in order of the date received. For example, the first comment letter received on July 9, 2020, is identified as L1. Separate comments within each comment letter are each assigned a number code; for example, L1-1, means letter number one, comment number one, etc. When the same comment is made by multiple parties, the response is provided following the first iteration of the comment, and all other same or similar comments that follow refer back to the initial response to the comment.

Comments received on the Draft EIR were reviewed to determine whether there is substantial disagreement about the potential significance of impacts. Any issues raised concerning potentially significant impacts were reviewed, addressed, and clarified.

Written comments received from State Agencies: 2

Written comments received from Regional and Local Agencies: 6

Written comments received from Interest Groups: 8

Written comments received from the Members of the General Public: 142

Table 9-1 Comment Letters

Letter ID	Name	Date
L1	Bret Marnell	7/9/2020
L2	Carolyn Howard-Johnson	7/9/2020
L3	Dan Petroff	7/9/2020
L4	Jake Katz	7/9/2020
L5	Ken Grayson	7/9/2020
L6	Romeo Balina	7/9/2020

RESPONSE TO COMMENTS

Letter ID	Name	Date
L7	Roberto Melendez	7/31/2020
L8	Bill Markis	8/1/2020
L9	Nancy and Dan Wall	8/5/2020
L10	Fred Wallingford	8/9/2020
L11	Jay Jen Mimi Sam and Ozzie Duplass	8/10/2020
L12	Kit Cole	8/12/2020
L13	Ken Salter	8/18/2020
L14	Mona Saba Valeriano	8/19/2020
L15	WM Johnson	8/19/2020
L16	Elisa Foster	8/22/2020
L17	Stephanie Chan	8/22/2020
L18	County of Los Angeles Fire Department	8/25/2020
L19	Joe Valeriano	8/29/2020
L20	Susan Hunt	8/30/2020
L21	Amy G. Koss	8/31/2020
L22	Janise and Eduardo Escobar	8/31/2020
L23	Janise and Eduardo Escobar	8/31/2020
L24	Philip Lee	8/31/2020
L25	Stephanie Schus Russin	8/31/2020
L26	Becky Newman	9/1/2020
L27	Department of Resources Recycling and Recovery (CalRecycle)	9/1/2020
L28	Larry and Laurel Haltum	9/1/2020
L29	Marie-Ange Vuillemin	9/1/2020
L30	Randy Glass	9/1/2020
L31	Gina Esposito	9/2/2020
L32	Christine Holland	9/3/2020
L33	Elizabeth Park	9/3/2020
L34	Jaime Borenstein	9/3/2020
L35	Karen King	9/3/2020
L36	Karen King	9/3/2020
L37	Gregg and Summer Wiele	9/4/2020
L38	Gregg, Summer, and Brooklyn Wiele	9/4/2020
L39	Donielle Lemone	9/5/2020
L40	Marwan and Amy Ataya	9/6/2020
L41	Priscila Kasha	9/6/2020
L42	Wyndham Chow	9/6/2020
L43	Emily Koss	9/7/2020

Letter ID	Name	Date
L44	Marguerita Drew	9/7/2020
L45	Aida Galusian	9/8/2020
L46	Orbel Minassian	9/8/2020
L47	Sharice B. Marootian	9/8/2020
L48	Talin Minassian	9/8/2020
L49	Teni Shahnazarian	9/8/2020
L50	Erika Kraetsch	9/9/2020
L51	Kate DiRienzo-Payne	9/9/2020
L52	Angela Cohen	9/10/2020
L53	Allen St. John	9/10/2020
L54	Ann Reed	9/10/2020
L55	Brian Newlin	9/10/2020
L56	Elan Borenstein	9/10/2020
L57	Gary and Cheryl Hannah	9/10/2020
L58	Isabella Meyer	9/10/2020
L59	Jamie Kellum	9/10/2020
L60	John and Caroline Weiner	9/10/2020
L61	Larry Moorehouse	9/10/2020
L62	Max and Lucilla Denuna	9/10/2020
L63	Valerie D.	9/10/2020
L64	Shackeh Mastian	9/11/2020
L65	Bethsaida (Betsy) Castillo-Cifuentes	9/14/2020
L66	Claudi Sysock	9/14/2020
L67	E. Nevins	9/14/2020
L68	Ferrari	9/14/2020
L69	Flora Corin	9/14/2020
L70	Frances F. Coburn	9/14/2020
L71	Monica Lago-Kaytis	9/14/2020
L72	Omar Mauricio Cifuentes	9/14/2020
L73	Dora Herrera	9/16/2020
L74	Nancy Wise	9/16/2020
L75	Rafael Hernandez	9/16/2020
L76	Randall Wise	9/16/2020
L77	Richard Espinosa	9/16/2020
L78	Shirley Woo	9/16/2020
L79	Cindy Swensen	9/17/2020
L80	Michael Mallory	9/19/2020

Letter ID	Name	Date
L81	Richard Schmittdiel	9/21/2020
L82	Joan Morris	9/22/2020
L83	Amaly Avakian	9/23/2020
L84	Coalition for Scholl Landfill Alternatives (CSLA)	9/23/2020
L85	Renee Holt	9/23/2020
L86	Sharon McDonald	9/23/2020
L87	Alice Ryu	9/24/2020
L88	Joan Morris	9/24/2020
L89	Linda Goodman Pillsbury	9/24/2020
L90	Randall and Rowena Abarro	9/24/2020
L91	Sylvia Denlinger	9/24/2020
L92	Virginia L Melin	9/24/2020
L93	Bill Fritz	9/25/2020
L94	City of Los Angeles Sanitation & Environment (LASAN)	9/25/2020
L95	Los Angeles City Council District 14	9/25/2020
L96	David Eder	9/25/2020
L97	Hassan Rad	9/25/2020
L98	Individual	9/25/2020
L99	Kim Turner	9/25/2020
L100	Lynn Woods	9/25/2020
L101	Mary Fischer	9/25/2020
L102	Melissa Estrada	9/25/2020
L103	Susan Leising	9/25/2020
L104	Claudia Puig	9/26/2020
L105	Madeline Wills	9/26/2020
L106	Cyndi Otteson	9/27/2020
L107	Dierdre Wills	9/27/2020
L108	Myanna Dellinger	9/27/2020
L109	Allan Herbert	9/28/2020
L110	Glenoaks Canyon Homeowners Association (GOCHA)	9/28/2020
L110-A	Glenoaks Canyon Scholl Canyon Landfill Work Group	9/28/2020
L110-B	Soil Water Air Protection Enterprise (SWAPE)	9/28/2020
L111	Kelly, Robert, Graham and Gabriel Scherer	9/28/2020
L112	Liz Amsden	9/28/2020
L113	Mary Fischer	9/28/2020
L114	Rona Compton	9/28/2020
L115	Tobin Wills	9/28/2020

RESPONSE TO COMMENTS

Letter ID	Name	Date
L116	Audry Zarokian	9/29/2020
L117	California Department of Fish and Wildlife (CDFW)	9/29/2020
L117-A	California Department of Fish and Wildlife (CDFW)	9/29/2020
L118	Glenoaks Canyon Homeowners Association (GOCHA)	9/29/2020
L119	Jackie Gish	9/29/2020
L120	Justin King	9/29/2020
L121	Miri Hindes	9/29/2020
L122	Scott Freudenberg	9/29/2020
L123	Shanah Blevins	9/29/2020
L124	Spencer Wright	9/29/2020
L125	Bonnie Voland	9/30/2020
L126	Chris Hulen	9/30/2020
L127	East Area Progressive Democrats	9/30/2020
L128	Edmund H. Lew	9/30/2020
L129	Eileen Hatrick	9/30/2020
L130	Gustavo Moreno	9/30/2020
L131	Gustavo Moreno	9/30/2020
L132	Jack Walworth and Dorothy Low	9/30/2020
L133	Jennifer Wright	9/30/2020
L134	Judy Gate	9/30/2020
L135	Koreen A. Cea	9/30/2020
L136	LA River Communities for Environmental Equity	9/30/2020
L137	Linda Vista-Annandale Association	9/30/2020
L138	Liuba Ruiz	9/30/2020
L139	Los Angeles County Public Works	9/30/2020
L140	Matt Bissonnette	9/30/2020
L141	Miri Hindes	9/30/2020
L142	Mitchell Rubinstein	9/30/2020
L143	Councilmember-elect Kevin de León	9/30/2020
L144	Patricia	9/30/2020
L145	Rebecca Addelman	9/30/2020
L146	Robinson Wills	9/30/2020
L147	Sergio Keusayan	9/30/2020
L148	South Coast Air Quality Monitoring District (SCAQMD)	9/30/2020
L148-A	South Coast Air Quality Monitoring District (SCAQMD)	9/30/2020
L148-B	South Coast Air Quality Monitoring District (SCAQMD)	10/17/2017
L149	Susan Harris	9/30/2020

Letter ID	Name	Date
L150	Teresa	9/30/2020
L151	Glendale Environmental Coalition and Sierra Club	10/1/2020
L152	Mark Alan Rothenberg	10/1/2020
L153	Nicole and Brian McGaffey	10/1/2020
L154	Raymond Cho	10/1/2020
L155	The Eagle Rock Association (TERA)	10/1/2020
L156	Walt Kasha	10/5/2020
L157	Armen and Chantiel M.	9/12/2020
L158	Hilda L. Solis, County of Los Angeles Board of Supervisors, First District, received March 3 , 2021	3/3/2021 (after close of public comment period)

9.2 TOPICAL RESPONSES

A number of comments received on the Draft EIR focused on several recurring issues and topics associated with the Project and CEQA-related process and analysis. To consistently and efficiently respond to these recurring topical comments, topical responses (Topical Responses) were prepared, and individual comment letter responses may refer to such Topical Responses. The main issues warranting Topical Responses include the following:

Table 9-2 Topical Responses

Topics	Topical Response No.
Biogas Renewable Generation Project Relationship to Landfill Expansion and Landfill Closure	1
Biogas Renewable Generation Project Relationship to Grayson Repowering Project	2
Cumulative Impacts	3
Aesthetics	4
Air Quality / Greenhouse Gases	5
Geology and Soils	6
Hazards and Hazardous Materials	7
Noise and Traffic and Transportation	8
Wildfire	9
Project Alternatives	10

9.2.1 Topical Response 1: Biogas Renewable Generation Project Relationship to Landfill Expansion and Landfill Closure

Summary of Comments

Comments were received stating opposition to the proposed Scholl Canyon Landfill Expansion, as well as concerns that the Project would result in extending the operational life of the landfill. Comments inquired about the closure date of the landfill and when it is expected to reach full permitted capacity from currently projected annual fill volumes. In response to those comments and questions, the most current estimate anticipates landfill closure between 2025 and 2026, which is based on an independent life estimate by SCS Engineers (SCS, 2020). The comments also questioned if the anticipated closure date remains accurate, and if so, why should the area be further industrialized when the landfill property is expected to be redeveloped as open space or recreation use after landfill closure. Additional concerns were expressed that the Draft EIR does not evaluate impacts of the Project after landfill closure.

Response

In March 2014, a Draft Environmental Impact Report for the Scholl Canyon Landfill Expansion Project was circulated for public review; however, the Scholl Canyon Landfill Expansion Project EIR was never certified, and as provided in Section 3.2 of the Biogas Renewable Generation Project Draft EIR, the Landfill Expansion is no longer proposed, is no longer reasonably foreseeable and, as such, was not included in the cumulative impact analyses of the Project's Draft EIR.

The Project is proposed to be located in an area within the Scholl Canyon Landfill where landfill gas (LFG) is already collected and processed. According to the Scholl Canyon Landfill Joint Technical Document (JTD), the Scholl Canyon Landfill is permitted to receive up to 3,400 tons per day of non-hazardous municipal solid waste (JTD, 2016-2020). These limits are fixed and cannot be increased without a permit modification and CEQA review, neither of which are a part of this Project or this Draft EIR.

Regardless of landfill operation, expansion, or even closure, LFG would continue to be generated for many years by the natural decomposition process within the existing landfill, and LFG from this decomposition process will continue well after landfill closure. According to the Agency for Toxic Substances and Disease Registry, "more recently buried waste will produce more gas than older waste. Landfills usually produce appreciable amounts of gas within one to three years and peak gas production usually occurs five to seven years after wastes are dumped. Almost all gas is produced within 20 years after waste is dumped; however, small quantities of gas may continue to be emitted from a landfill for 50 or more years (ATSDR, 2001)." For example, LFG continues to be collected from the golf course side of the former Scholl Canyon Landfill after nearly 45 years after closure.

This Draft EIR evaluates the potential environmental impacts of constructing and operating a facility that is designed to combust the maximum volume of LFG estimated to be available from the landfill at any time during operation of the Project. As indicated above, based on an independent life estimate by SCS Engineers, the Scholl Canyon Landfill is currently estimated to reach capacity between 2025 and 2026

(SCS, 2020). A peak 135.26 MMBtu/hr LFG at a flow rate of 6,200 standard cubic feet per minute and 36 percent methane is expected to be produced and captured at Scholl Canyon Landfill during 2022. The volume and methane content of LFG would then decrease over time. Utilizing the peak volume and methane content of LFG as the basis for analyzing potential environmental impacts of the Project in this Draft EIR represents a conservative, worst-case scenario as less LFG would be expected to be produced, captured, and combusted in post-2022 Project operation years. The Project's reciprocating internal combustion engines do not require supplemental natural gas to operate when the LFG fuel source has an approximate methane content of 34 percent or more. When the methane content of the LFG fuel source is below approximately 34 percent, the reciprocating internal combustion engines require a two to three percent natural gas supplement. If required, natural gas makeup for the Project would be well below the 10 percent maximum natural gas makeup threshold applicable to determining Renewable Portfolio Standard eligibility for which the Project qualifies. Additionally, any natural gas makeup required during Project operation would be at a future date when the volume and methane content of LFG available at Scholl Canyon Landfill decreases over time. At no time during operation would the Project combust more than 135.26 MMBtu/hr LFG at a flow rate of 6,200 standard cubic feet per minute and 36 percent methane (even if natural gas makeup is part of this fuel stream).

According to Article IX, Section E, of the Joint Powers Agreement (JPA), "At such time as all sanitary landfill operations are completed by Los Angeles County Sanitation District at the Premises, and all areas have been surrendered by Los Angeles County Sanitation District to City for park, recreation, and roadway purposes, or for the implementation of solid waste management alternatives or other facilities related to the operation of a sanitary landfill, henceforth City shall be solely responsible for the control of LFG on the Premises, including the operation and maintenance of all necessary gas control equipment and facilities, and the construction of any additional facilities and/or implementation of any additional procedures according to accepted practice and as required by any regulatory authority having jurisdiction over the Premises (JPA, 1997)."

Once all sanitary landfill operations are completed, and after the Los Angeles County Sanitation District surrenders all areas to the City pursuant to the JPA, thereafter the JPA allows for the closed areas of the Scholl Canyon Landfill be converted to a park, recreation, and roadway purposes, or for the implementation of solid waste management alternatives or other facilities related to the operation of a sanitary landfill. The City shall be solely responsible for the control of LFG on the premises, including the operation and maintenance of all necessary gas control equipment and facilities, and the construction of any additional facilities and/or implementation of any additional procedures according to accepted practice and as required by any regulatory authority having jurisdiction over the premises.

This Project was designed, and equipment selected based on the amount of LFG expected to be produced for the anticipated remaining life of Scholl Canyon Landfill, and to maximize economic beneficial reuse of that LFG at Scholl Canyon Landfill, as opposed to burning off the LFG. The Project would be operated and maintained as long as the LFG can be used to generate electricity; after which time electrical generating equipment and equipment foundations would be removed. Any remaining LFG that continues to be produced after it is no longer economically feasible to combust the LFG in the reciprocating internal combustion engines to generate electricity would be managed through either the existing permitted flaring operation as appropriate, or through another technological solution that cannot

be predicted with reasonable certainty at this time, and is therefore excluded from the scope of this EIR. However, as the Project will likely continue to operate after landfill closure, the potential cumulative environmental impacts of operating the Project in close proximity to a post-landfill closure recreation or open space land use was analyzed in this Draft EIR. Please refer to Topical Responses No. 3, 5, and 8 for further information on potential cumulative impacts of the Project and future recreation use of the adjacent landfill area after closure. These analyses demonstrate the power generation and recreation land uses would not conflict with one another and potential cumulative impacts would be less than significant.

SCAQMD Rule 1150.1 requires that LFG be collected and properly managed in order to control emissions and odors, and to prevent public health and safety hazards. Combusting the LFG in the proposed engines provides environmental benefits over the use of the existing or new flares because combustion by the Project would yield approximately 12-megawatts of Renewable Portfolio Standard eligible electricity from an existing energy source that must be collected and managed, whereas flaring the LFG yields no renewable energy benefit whatsoever. In response to comments received regarding the installation of new flares instead of the proposed Project, please refer to Section 5.6.1 of the Draft EIR which discusses the analysis of Alternative 1, the No Project Alternative. The analyses in the Draft EIR concludes that the proposed Project, existing flares, or new flares which Los Angeles County Sanitation District would install to replace the existing flaring system, would all result in less than significant potential air quality and health risk impacts.

The Project has no relation to, or effect on, existing truck traffic associated with landfill operations because other than for construction and operation of the Project (which is analyzed in the Draft EIR), the Project will not increase the amount of trash hauled to Scholl Canyon Landfill for disposal. Specifically, the Project will generate six passenger car equivalent (PCE) trips per day during Project operations. During construction there will be up to 42 PCE trips per day on peak days, which would equate to an average of five trips per hour assuming an eight-hour workday during the four to five months of demolition, nine to ten months of site grading and construction, and two to three months for system start up. Please refer to Draft EIR Section 2.5 for the Project schedule.

The Project is a Separate Proposal and has Independent Utility from either the Grayson Power Plant Project or the now-defunct Scholl Canyon Landfill Expansion Project

According to *Laurel Heights Improvement Assn. v Regents of the University of California*, (1988) 47 Cal.3d 376, a project description must include all relevant parts of a project, including future expansion or later phases of the project that will foreseeably result from project approval. (Guidelines §15126). There is a two-pronged test to determine what is the “whole of the project”. The whole of the project consists of those activities that are, “(1) …a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.”

Here, the Project is not included in, contemplated by or reasonably foreseeable consequence of either a landfill expansion or landfill closure. The Project is not dependent on, and does not compel the expansion of, or prolonged operation of, the existing landfill. Landfill expansion is not a part of this Project.

Continued operation of the landfill and any expansion of the landfill in no way compels development of the Project because as previously described, the landfill will continue to generate LFG for many years to come, and that LFG is required to be captured and incinerated regardless of the status of the landfill. Neither a landfill expansion nor the Project is a reasonably foreseeable consequence of, or dependent on the other. There is already a SCAQMD permitted LFG capture and flaring system at Scholl Canyon Landfill that is capable of combusting any and all LFG generated by the landfill, however, energy generated by flaring the LFG is being lost when combusting the LFG can be put to a beneficial use that maximizes use of renewable resources.

The purpose of the Project is to:

- Provide beneficial use of naturally occurring LFG as fuel for power generating equipment;
- Utilize this renewable energy resource to help the City meet its California mandated Renewable Portfolio Standard;
- Use the existing transmission system to deliver generated electricity into the electrical grid without a need for transmission facility upgrades (or construction of new transmission facilities, which is also a cost savings);
- Build an on-site facility that will use the LFG as fuel; and
- Abandon the existing pipeline between the landfill and Grayson Power Plant that is currently not in use because LFG cannot be combusted at Grayson Power Plant (See Topical Response No. 2 in Section 1.1.1.2 below).

In addition, and as indicated above, CEQA review must include an analysis of the environmental effects of future expansion or other action if: "(1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects." *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 396. Absent these two circumstances, the future action need not be considered in the EIR for the Project.

As clarified in this Topical Response No. 1, the Project is not a reasonably foreseeable consequence of any landfill expansion and implementation of the Project will not induce or require prolonged operation or expansion of the landfill.

9.2.2 Topical Response 2: Biogas Renewable Generation Project Relationship to Grayson Repowering Project

Summary of Comments

Comments were received that the Project and the Grayson Repowering Project must be analyzed as one project. Comments were received that neither the Grayson Repowering Project Draft EIR nor the Project Draft EIR are properly accounting for greenhouse gas (GHG) emissions, increases of LFG combustion, nor the potential for even greater emissions if the Project is not built or if it fails to perform. Additional

comments were received questioning why the LFG cannot continue to be captured and piped to Grayson as it had in the past.

Summary of Responses

The Project is not a part of, the same as, or a direct or reasonably foreseeable consequence of, the Grayson Repowering Project because it will operate completely separate and independent from the Grayson Repowering Project. On that basis, the Project is considered to have independent utility. This means that regardless of whether the Grayson Repowering Project moves forward or not, the Project is independently viable and can be separately developed.

As noted previously in *Laurel Heights Improvement Assn. v Regents of the University of California,* (1988) 47 Cal.3d 376, a project description must include all relevant parts of a project, including future expansion or later phases of the project that will foreseeably result from project approval. (Guidelines §15126).

Here, the Project is not included in, contemplated by, or a reasonably foreseeable consequence of the Grayson Repowering Project; the Project will be constructed, permitted and operated completely interdependent from the Grayson (See below). The Project is designed to combust LFG and convert LFG into electrical energy which is fed into existing transmission lines at Scholl Canyon Landfill that connect with Glendale's existing electrical grid. LFG from Scholl Canyon Landfill, which is a natural consequence of the decomposition of landfill materials, is required to either be flared or captured and converted for beneficial reuse. Capturing and converting Scholl Canyon Landfill biogas is not a requirement of, or prerequisite to, the Grayson Repowering Project. The existing Grayson Plant and the proposed Grayson Repowering Project are not dependent on LFG from the Scholl Canyon Landfill. Similarly, the Project is not in any way dependent on the approval or implementation of the Grayson Repowering Project. The Project serves different purposes, operates independently from, and is implemented separately from the Grayson Repowering Project.

Specific Responses

Current and Proposed Use of Landfill Gas

When the prior Mitigated Negative Declaration (MND) report was being prepared for the Project in 2017, the majority of LFG produced by the Scholl Canyon Landfill was piped and combusted in existing boilers at Glendale Water and Power's (GWP's) Grayson Power Plant. Since April 2018, GWP discontinued combusting LFG in the boilers at the Grayson Power Plant because, among other reasons, the aging engines could not efficiently burn that gas. All LFG produced by the landfill is presently being combusted in the existing flare system at the Scholl Canyon Landfill.

According to the U.S. Department of Energy, U.S. Energy Information Administration, the five commonly used renewable energy sources include LFG and biogas, and municipal solid waste.[76] Landfills for municipal solid waste are a source of this energy from anaerobic bacteria—bacteria that can live without

[76] https://www.eia.gov/energyexplained/?page=renewable_home

the presence of free oxygen—living in landfills that decompose organic waste to produce biogas. Landfills typically control the naturally occurring methane gas emissions by burning or flaring methane gas or using it as an energy source. According to the U.S. Department of Energy, many landfills collect biogas, treat it, and then sell the methane, and some landfills use the methane gas to generate electricity.[77] This is important to consider because burning LFG, either in flares or in power generation equipment, is better environmentally because un-combusted methane is a potent greenhouse gas. Consequently, converting biogas to energy is not only better for the environment; it is a renewable energy source that helps the City meet the California Renewable Portfolio Standard mandate.

The Project would be located within the Scholl Canyon Landfill site where LFG is already currently being collected and processed. As part of the Project, the 5.5-mile pipeline connecting the landfill to the Grayson Power Plant would be decommissioned, purged, capped, and abandoned in place.

The Biogas Renewable Generation Project has Independent Utility from the Grayson Repowering Project

Under CEQA, a proposal that is related to another project, but has its own "independent utility" and is not necessary for that other project to proceed, need not be included as part of the project description, and may be reviewed in its own CEQA document, as a separate project. (See *Planning & Conservation League v. Castaic Lake Water Agency* (2009) 180 Cal.App.4th 210, 237). Accordingly, two projects may undergo separate environmental review when the projects serve different purposes or can be implemented independently. (See *Banning Ranch v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1223) (citing *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 99; *Sierra Club v. West Side Irrigation Dist. (*2005) 128 Cal.App.4th 690, 699; *Plan for Arcadia v. City Council of Arcadia* (1974) 42 Cal.App.3d, 712, 724)).

The Project is not dependent on the approval or implementation of the Grayson Repowering Project, nor is the Grayson Repowering Project dependent on the approval or implementation of the Project. The Project serves different purposes, operates independently from, and is implemented separately from the Grayson Repowering Project. Neither the Grayson Repowering Project nor the Project is a reasonably foreseeable consequence of the other. The LFG that is generated by Scholl Canyon Landfill is required to be captured and combusted. As stated, there is an existing SCAQMD permitted LFG capture and flaring system at Scholl Canyon Landfill that is capable of combusting any and all LFG generated by the landfill, but this LFG is not being combusted in a manner that will allow its beneficial use, especially now at a time when local renewable energy sources are vitally important.

The Grayson Repowering Project objectives are to:

[77] https://www.eia.gov/energyexplained/?page=biomass_biogas

- Integrate with local and remote distributed renewable energy resources to provide sufficient capacity and energy to ensure reliable service at all times for the City and to support the City's compliance with California's Renewable Portfolio Standards.

- Utilize current and reliable technology and control systems to provide reliable, cost effective, and flexible generation capacity for the City to serve its customer load.

- Provide a local generation resource sufficient to meet resource adequacy requirements, and the City's obligations within the Balancing Area 7 (BA) to balance load and resource at the interconnection with the BA, in accordance with industry standards including North American Electric Reliability Corporation (NERC) and Western Electricity Coordinating Council (WECC) requirements; thus, providing local reliability and contributing to grid stability within the Los Angeles Basin.

- Provide sufficient locally controlled generation to minimize the City's reliance on importing power from remote generation locations through a congested transmission grid system subject to planned and unplanned outages and reduces the power rating, making the delivery of energy to serve load less reliable than local generation.

- Replace the aged, unreliable, less efficient, high maintenance steam boilers with new, efficient, and less environmentally impactful generation technologies that meet SCAQMD's Rule 1304(a)(2) providing an offset exemption for an electric utility boiler replacement project.

- Locate the proposed Project at existing City property already permitted and used for generation to minimize the need for major infrastructure improvements such as fuel supply, water, wastewater, recycled water and transmission facilities, or the need to purchase additional property.

- Provide generation that is highly efficient to maintain reasonable cost of generation to minimize the impact on customer electric rates and help manage costs of delivering energy to the City's customers.

- Support water conservation efforts by eliminating the use of potable water for generation purposes.

- Reduce the per megawatt-hour (MWH) creation of emissions and consumption of water (See Final EIR, Grayson Repowering Project, Section 2.4).

In contrast, the Project objective is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate power.

Additional Project benefits include:

- Provide beneficial use of naturally occurring LFG as fuel for power generating equipment onsite.

- Utilize this renewable energy resource to help the City meet its California mandated Renewable Energy Portfolio.
- Use the existing transmission system to deliver generated electricity into the electrical grid without a need for transmission facility upgrades.
- Build an on-site power plant utilizing LFG as fuel, thus avoiding the need to transport LFG via pipeline and avoid the attendant need to inspect, maintain and operate additional infrastructure.
- Abandon the existing pipeline between the landfill and Grayson Power Plant, which would in turn allow the SCAQMD to make priority reserve offsets available and offsets would not have to be purchased on the open market.

As stated above, the objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate power.

The Grayson Repowering Project cannot currently, and will not be equipped to burn LFG because of the lack of space to accommodate additional infrastructure and additional significant air quality impacts, which do not make transporting LFG for combustion at the Grayson Power Plant a viable alternative (See Topical Response 10 – Alternatives).

Under the existing SCAQMD permit, the LFG must be flared at Scholl Canyon Landfill. Further, there is no requirement (SCAQMD or otherwise) that mandates LFG should or can only be flared; LFG can be burned and used to generate electricity as a byproduct of that combustion.

In sum, while the Project will and Grayson Repowering Project already does generate electricity, that does not make them reasonably foreseeable consequences of each other; they have different objectives, would be implemented independently, and would operate independently. The Project could be developed with or without the repowering of Grayson, and it could be implemented or abandoned whether or not the Grayson Repowering Project is approved and implemented.

9.2.3 Topical Response 3: Cumulative Impacts

Summary of Comments

Comments were received that the Draft EIR did not analyze potential cumulative impacts of the Project, particularly those associated with the future use of the landfill as recreation/open space.

Response

Lead Agencies are required to determine whether the project's incremental effect combined with the effects of other projects is "cumulatively considerable." (14 Cal Code Regs §15130(a)) This determination is based on an assessment of the project's incremental effects viewed in connection with the effects of past projects, the effect of other current project, and the effects of probable future projects. (14 Cal Code

Regs §15065(a)(3)). While it is not known precisely when and what areas of the Scholl Canyon Landfill will be closed, or when such closed landfill areas will be ready for conversion to uses specified in the JPA, it is nonetheless reasonably foreseeable that such a conversion of use will occur at some point in the future. Section 3.2, Related Projects, and Cumulative Impacts, of the Draft EIR is therefore being clarified to include an examination of future use of the landfill as a recreation/open space.

Also, with respect to the cumulative impact analysis, the City received a letter from SCAQMD noting other nearby permitted stationary sources of air pollutant emissions and if those sources were considered in the Projects analysis of potential cumulative impacts. Topical Response No. 5 and Response to Comment Letter L148 address SCAQMD's comments.

9.2.4 Topical Response 4: Aesthetics

Summary of Comments

Comments were received expressing general concern that the Project will have negative aesthetic impacts (including from lighting) on areas surrounding the Project as well as on areas outside of the City of Glendale. Comments included requests for updated and additional view shed analysis for existing vistas in surrounding and nearby housing associations. Commenters expressed concern over the aesthetic impact of the Project on an adjacent future recreational use after landfill closure.

Comments were also received asserting that the Project will violate Glendale's anti-ridgeline development goals for aesthetics and questioned if the Rim of the Valley Corridor Preservation Act exclusion will remain applicable. In relation to this, commenters posed questions regarding the effects of the Project on the ridgeline. Questions included:

- Could Project components be constructed elsewhere to not aesthetically affect the ridgeline? (Please note that this question presumes the Project would aesthetically impact the ridgeline, which presumption is not borne out in the analysis)
- Could Project lighting be motion detector?
- Would ridgeline excavation occur?

Additional comments asserted that the Project is not being appropriately designated as a utility in order to obtain exemption from the Glendale Municipal Code (GMC).

Response

Section 4.1 of the Draft EIR analyzes the Project impacts to Aesthetics. The CEQA Guidelines (Appendix G, Environmental Checklist, I. Aesthetics) require that only public views be considered in the visual impact analysis. Public views are those that are experienced from publicly accessible vantage points. Therefore, private views, such as those from single-family homes, are not required to be analyzed as part of CEQA. Visual conditions of the views from each of the four public viewpoints were evaluated in 2016 for the Draft MND and these viewpoints remain relevant and unchanged. This analysis determined that the Project would have less-than-significant to no-impact on aesthetics/visual resources. The aesthetics impact analysis determined:

- There are no designated scenic vistas near the Project site or within other parts of the existing Scholl Canyon Landfill, nor are there any designated scenic vistas from which the Project would be visible (see Section 4.1.3 of the Draft EIR).

- The proposed water tank would be located on a primary ridgeline. However, exemptions are provided by GMC, Chapter 16.08 - Design Standards, and allow for the maintenance, upgrading or improvement of an existing public or quasi-public utility located within an identified primary ridgeline. Furthermore, the City of Glendale's Land Use Element classifies the Project site as Recreation/Open Space. The Open Space and Conservation Element's focus is on preservation of open space, natural resources and amenities that are important to the residents of the City. Implementation of this Conservation Element required creating a Special Recreation (SR) zone, which permits various types of open space and recreation uses. The proposed utility and transmission facility are conditionally permitted in the SR zone and requires special consideration by the Planning Commission to protect open space, natural physical features and scenic resources, and to foster compatibility between uses. The Project will require a Conditional Use Permit to be reviewed by the Planning Commission.

- There are no state-designated scenic highways in the City of Glendale (California Scenic Highway Mapping System, 2017). Therefore, the Project would not damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. (see Section 4.1.3 of the Draft EIR).

- The Project is proposed to be located within the existing boundaries of a non-fill portion of the existing Scholl Canyon Landfill. The tallest Project features will be approximately 40 feet above ground, consisting of four, approximately 18-inch outside diameter engine exhaust stacks and a flare. Project equipment will be approximately 25 feet in height. The office and warehouse space will be approximately 12 feet in height. The Project consists of improvements that would be consistent with the industrial character of the existing LFG collection system facility and the Scholl Canyon Landfill. The existing LFG collection system facility has numerous structures, trailers, and equipment distributed throughout the Project site. Placement of Project components is based on geotechnical and structural stability as well as distance from existing attributes such as the water receiving location and general cohesion with Project design.

- Earth moving activities including excavation and grading will be implemented during the construction phase of the Project and are required for the installation of the proposed water tank. While construction of the proposed water tank would occur on a primary ridgeline, the Project is a utilities land use that is exempt from the requirements of GMC related to development on identified primary ridges. Therefore, the Project construction and system start-up activities would not conflict with goals related to the preservation of ridgelines and slopes (Goal 5).

- The Project consists of the demolition and upgrade to an existing industrial land use that does not have any scenic views, scenic vistas, or other important scenic resources that could be potentially significantly impacted. The existing LFG collection facility is presently a limited source of

> nighttime light and glare. Area lighting would be shielded, and light switch and motion sensors would be provided for safety at the Project facility. Lighting would be pointed downward and inward to minimize offsite impacts. Following recommendations received from California Department of Fish and Wildlife (CDFW), low level lighting will be used for the Project and all non-essential lighting will be eliminated. Additionally, the Project will limit the use of artificial light during the hours of dawn and dusk. All construction activities would be performed during daylight hours and would not result in an increase in offsite light or glare. The incremental amount of light and glare generated by the Project would be minimal due to the design measures incorporated into the Project, and because the Project site is located within a portion of the existing landfill with limited visibility from public viewing locations.

The Project is a use conditionally permitted by the City of Glendale General Plan and Zoning Ordinance, subject to the approval of a Conditional Use Permit (GMC Table 30.15-A). The GMC establishes ridgeline protection policy that expressly allows for the maintenance, upgrading or improvement of existing public or quasi-public utilities which traverse identified primary ridges. (GMC section 16.08.010.G). The Scholl Canyon Landfill, including the existing LFG collection facility site which the Project will replace, is located within an area of primary ridgeline that contains existing permitted public and quasi-public utility features. The Project's proposed power production equipment and appurtenant facilities are utility structures similar to the existing LFG collection system the Project will replace and similar to other operational features within the Scholl Canyon Landfill site. Portions of the Project that may be visible from offsite viewing locations, within and outside of the City of Glendale, are similar to, and would be consistent with, the existing views of the landfill. The Draft EIR examined all the aesthetic impact thresholds for the Project and determined that the Project would not create any new significant impacts on aesthetic resources.

Rim of the Valley Preservation Act

Although the hills surrounding the Scholl Canyon Landfill have been included in the Rim of the Valley Preservation Act, based on review of the Rim of the Valley maps, Scholl Canyon Landfill itself is excluded from the proposed Rim of the Valley Unit and would not be included as part of the Santa Monica Mountains National Recreation Area. Therefore, the statement in Section 4.1.3.2 of the Draft EIR that "*there are no designated scenic vistas near the Proposed Project site or within other parts of the existing Scholl Canyon Landfill, nor are there any designated scenic vistas from which the proposed Project would be visible"* is accurate because the expansion of the Santa Monica Mountains National Recreation Area is not approved, and the Scholl Canyon Landfill is excluded from the Rim of the Valley Unit. Additionally, a Fact Sheet published by Representative Adam Schiff, states that in the event the expansion of Santa Monica Mountains National Recreation Area is approved, it would respect "private property rights and existing local land use authorities. It will not require a landowner to participate in any conservation or recreation activities, and it will not put any additional restrictions on property owners. The bill does not allow for land acquisition through eminent domain." Therefore, by intentionally excluding the Scholl Canyon Landfill from the proposed Rim of the Valley Unit and since there is no intent to restrict property rights, or right to condemn such property, it can be concluded that permitted activities within the Scholl Canyon Landfill would not be subject to the restrictions envisioned under the proposed Rim of the Valley Preservation Act.

Article IX, Section E, of the JPA, states "At such time as all sanitary landfill operations are completed by Los Angeles County Sanitation District at the Premises, and all areas have been surrendered by Los Angeles County Sanitation District to City for park, recreation, and roadway purposes, or for the implementation of solid waste management alternatives or other facilities related to the operation of a sanitary landfill, henceforth City shall be solely responsible for the control of LFG on the Premises, including the operation and maintenance of all necessary gas control equipment and facilities, and the construction of any additional facilities and/or implementation of any additional procedures according to accepted practice and as required by any regulatory authority having jurisdiction over the Premises (JPA, 1997)." Based on these requirements of the JPA, and purpose of this EIR, future use of closed Scholl Canyon Landfill areas that are not devoted to gas control equipment and facilities will either be recreation or an open space use outside the limits of the Rim of the Valley Unit.

Because the landfill will continue to produce methane from the decomposition of landfill materials for years after closure, it is expected that the Project would continue to operate after areas of the Scholl Canyon Landfill begin to close and be converted to recreation, open space uses and for roadway purposes. By way of example, the Scholl Canyon Golf Course is constructed and operates on a closed part of the Scholl Canyon Landfill, and that area continues to produce methane which is collected and flared. It is therefore expected that the Project and future recreation and/or open space areas would operate simultaneously and the future recreation and open space areas would therefore need to be planned to: 1) accommodate the City's current and on-going obligation to control LFG on site, including the operation and maintenance of all necessary gas control equipment and facilities, and 2) accommodate the construction of any additional facilities and/or implementation of any additional procedures according to accepted practice and as required by an regulatory authority having jurisdiction over the site as it relates to gas control measures.

9.2.5 Topical Response 5: Air Quality / Greenhouse Gases

Summary of Comments

Comments received expressed concern in regard to:

- What appears to be the use of emission offset credits to justify the project, while ignoring local air quality (e.g., "… trading these pollutants with credits so it wipes out the emissions on paper only.").
- The air quality study conducted for the Biogas Renewable Generation Project did not include existing emissions at the Scholl Canyon Landfill.
- Cumulative impacts of the Grayson Repowering Project and the Scholl Canyon Landfill Expansion Project were not addressed.
- Air quality impacts from temporarily flaring LFG.

- Air quality impacts from flaring LFG and operating the reciprocating internal combustion engines simultaneous in order to capture and combust expected LFG.
- Health risks for local populations, including local commercial and residential receptors.
- The need to burn LFG.
- The inclusion of GHG emissions resulting from LFG combustion at Grayson Power Plant in the Biogas Renewable Generation Project baseline conditions.
- The basis for selection of baseline conditions for the purposes of CEQA analysis.
- Increase or reduction in LFG production.
- Dioxin and furan compounds emissions.
- Air quality impact of the Project when the landfill is closed and converted to recreational use.
- The availability of Priority Reserve Credits.
- Application of Best Available Control Technology (BACT).

Response

SCAQMD Regulatory Program for New Sources

Emission offsets are only one of the three mandates by SCAQMD and USEPA that apply to the construction of an emission source, such as the Biogas Renewable Generation Project. Those mandates require that the Best Available Control Technology ("BACT") be used to reduce emissions to the Lowest Achievable Emission Rate ("LAER"), that no net emission increase in the South Coast Air Basin (managed through the use of emission offsets) occur, and that air quality analysis using approved models demonstrate that a new source would not result in significant local air quality impacts. These mandates are collectively referred to as New Source Review (NSR). Compliance with each of the three NSR mandates must be made independently and in no case is compliance with one mandate (such as the requirement to offset emission increases) a substitution for compliance with the other mandates, such as the prohibition against causing a violation of, or significantly worsening a violation of, ambient air quality standards. Failure to comply with any of the three mandates will disqualify the Project from SCAQMD construction and operating permits. The following sections of this Topical Response summarize the three NSR mandates as applied to the Project.

<u>BACT / LAER</u>

NSR requires that new emissions sources that are part of the Project incorporate current BACT and meet LAER. This is accomplished by utilizing highly efficient biogas reciprocating internal combustion engines

combined with effective post-combustion emission control technology. The technology selected for the proposed Project is highly effective at reducing emissions.

No Net Emission Increase

NSR requires that, on a regional basis, no increase in nonattainment pollutants or their precursors would result from the Project. This provision applies to emissions of NO_X, VOC, PM10 / PM2.5 and SO_X. CO emissions do not require offsets because the South Coast Air Basin is in attainment with both state and federal ambient CO standards. Even with the application of BACT, however, a proposed project could result in an increase in these emissions. The federal Clean Air Act and SCAQMD permitting policy recognize that a blanket prohibition of new emission sources in any community would be harmful to the wellbeing of the community. To provide a vehicle for managing no net increase in regional emissions with the need to build new sources to address community need, both USEPA and SCAQMD allow for the use of emission offset credits. The offset credit program allows SCAQMD or permit holders to generate an instrument (credit) reflecting a real, permanent and quantifiable emission reduction. The instrument can then be used to offset an emission increase at an existing or new facility.

Emission offsets for the Project include verified and quantifiable emission reduction credits that are held in the SCAQMD Priority Reserve, which is established to provide offset credits for specific priority sources that must be operated to ensure public safety and wellbeing. LFG naturally generated by the Scholl Canyon Landfill is required to be handled through a gas collection and combustion system, and not vented to the atmosphere. Operating without such a system would be in violation of federal and SCAQMD regulations and would contribute to emissions of GHGs, VOCs and toxic pollutants. The SCAQMD's Priority Reserve provides credits for essential public services and SCAQMD Reg XIII defines the construction and operation of a landfill gas control or processing facility as an essential public service. The requirement to offset increases in nonattainment pollutants or their precursors ensures that there would be no net increase of these air pollutants in the South Coast Air Basin from the Project, and it would not conflict with the implementation of SCAQMD's air quality management plan.

Priority reserve credits reflect emission reductions that are real, quantifiable and permanent in accordance with SCAQMD NSR regulations as well as state and federal regulations. SCAQMD maintains the credits to account for emission increases from essential public service facilities like Scholl Canyon Landfill and for small emission sources that are exempt from the requirement to secure offsets from the private market. On September 4, 2020, SCAQMD provided its annual report of the accounting of its offset reserves. Based upon the SCAQMD report, the reserve of available credits is not in jeopardy of being depleted because annual emission reductions due to stationary source facility closures and the application of emission control technologies are significantly greater than emission increases from new sources. The 2020 report indicates that SCAQMD has credits available to offset approximately 25 tons per day for NOx, 117 tons per day for VOC, 4 tons per day for SOx and 17 tons per day for PM10. The Project will require Priority Reserve credits of approximately 75 pounds per day NOx (0.15% of reserves), 107 pounds per day VOC (0.05% of reserves), and 35 pounds per day SOx (0.4% of reserves). No offsets are needed for PM10 because the project reflects an emission reduction from currently-permitted levels. The SCAQMD does not require offsets for CO.

Eligibility for Priority Reserve credits is granted through SCAQMD Rule 1309.1. Four classes of facilities/ projects are eligible for Priority Reserve credits, including Innovative technology, research operations, essential public service facilities and certain electrical generating facilities. Eligibility for Priority Reserve credits is determined by meeting any single one of the four classes of facilities or projects. Essential public facilities have priority when accessing the reserves over the three other facility or project classes. The Scholl Canyon Landfill and the Project are classified as essential public service facilities and will access the SCAQMD Priority Reserve as such.

Ambient Air Quality Demonstration

The third component of NSR is a required demonstration that a new emission source will not cause a violation of, or significantly add to an existing violation of, state or federal ambient air quality standards. Although the Project meets BACT / LAER to reduce potential emissions and is fully offset to ensure no net increase in nonattainment pollutants, GWP must independently demonstrate that the Project will not cause or significantly add to a violation of state and federal ambient air quality standards for NO_2, CO, PM10, PM2.5 and SO_X (there are no ambient VOC standards).

The EIR contains results of the air quality impact analysis prepared for the Project which demonstrates compliance with NSR requirements. The analysis was conducted using tools mandated by USEPA and in accordance with policies and protocol established by SCAQMD. Prior to initiating the analysis, the City submitted an analysis protocol to SCAQMD for comments and approval, which SCAQMD approved. SCAQMD provided comments to the City of the Draft EIR. Please refer to Response L148.

New Source Review (NSR) Summary

SCAQMD requires that three independent NSR demonstrations be made. They include demonstrations that the Project: 1) will use BACT and meet LAER to minimize emissions to the greatest degree possible, 2) does not result in an increase in regional emissions through the use of emission offsets, and 3) does not result in a violation or significant increase to an existing violation of an ambient air quality standard. These demonstrations support not only the CEQA analysis contained in the EIR but must also be met for SCAQMD to issue construction and operating permits for the Project.

The EIR includes an updated air quality impact analysis that reflects more current baseline ambient air quality and emissions than were utilized for the MND. SCAQMD suggested that the baseline data be updated to reflect more current operations since the MND was considered. Like the Draft MND, this EIR demonstrates compliance with all three components of SCAQMD NSR. To ensure clarity, the EIR has been updated to show Project impacts relative to the baseline data contained in the MND as well as the more current baseline data that SCAQMD suggested to be used in the EIR for air quality impact analysis.

Air Quality Impact from the Existing Emissions at the Landfill and Other Proposed Projects

Existing Emissions at the Landfill

The current landfill activities that may generate emissions include off road equipment, vehicles, and stationary sources, which include the existing flares, portable engines, storage and dispensing system, and consumer products, such as paints, sealants, and cleaners. These existing emissions are part of the background concentration of criteria pollutants in the ambient air quality analysis of the Draft EIR. The background concentrations were added to the criteria air pollutants concentration of the proposed Project to analyze the impact to the localized ambient air quality. As shown in the Draft EIR, the total criteria pollutant concentrations are below the state and national ambient air quality standards.

Air Quality Impacts from Flaring Landfill Gas at Scholl Canyon Landfill

As part of the Project, the LFG piping system to Grayson Power Plant will be decommissioned, purged, capped, and abandoned in place and as required by law and authorized by existing permits. In 2018, the City stopped combusting LFG at the Grayson Power Plant and has instead been incinerating the gas at the Scholl Canyon Landfill flares. The LFG will continue to be combusted in the existing flare system to control fugitive VOC and methane emissions until the Project is constructed. The Project does not increase the volume of gas being combusted. SO_X emissions are largely fuel-dependent based upon sulfur content of the fuel and are not dependent upon combustion technology. SO_X emissions rates from combusting LFG – whether in a flaring system or boiler system are expected to be the same.

The proposed Project has gone through two different baseline emissions scenarios. When the Project started, no criteria baseline emissions were shown in the MND because the landfill gas was mainly combusted in the boiler system at the Grayson Power Plant. The emission inventory was shown in MND document date July 31, 2017. In 2018, the landfill gas was combusted in existing flare system at Scholl Canyon Landfill until now. The emission inventory shown in Draft EIR used the emission from the existing flare system as the baseline emissions. The following tables summarize the analysis with two different baseline scenarios:

Emission Inventory No. 1 LFG Combusted at Grayson Power Plant (Shown in MND)

Pollutant	Total Proposed Project (Engines Daily Max. Emissions (lbs./day)	Less: Baseline Emissions (lbs./day)	Offset Allocations from the SCAQMD Priority Reserve (lbs./day)	Remaining Scholl Canyon Power Generating Facility Emissions (lbs./day)
NO_X	165	0	165	0
CO	919	0	0	919
VOC	114	0	114	0
PM10	58	0	58	0
PM2.5	58	0	0	58
SO_X	81	0	81	0

Emission Inventory No. 2 LFG Flaring at Scholl Canyon Landfill (Shown in Draft EIR)

Pollutant	Total Proposed Project (Engines Daily Max. Emissions (lbs./day)	Less: Baseline Emissions (lbs./day)	Offset Allocations from the SCAQMD Priority Reserve (lbs./day)	Remaining Scholl Canyon Power Generating Facility Emissions (lbs./day)
NO_X	165	90	75	0
CO	919	42	0	877
VOC	114	7	107	0
PM10	58	62	0	[4]
PM2.5	58	62	0	[4]
SO_X	81	46	35	0

As shown in both tables, most criteria pollutants from both baseline emission scenario would not exceed the significance thresholds. CO and PM2.5 emissions would exceed the significance thresholds with Emissions Scenario No. 1 and CO continues to exceed the significance threshold when the flaring baseline is incorporated per Emissions Scenario No. 2. However, as discussed in both MND and draft EIR, air dispersion modeling for CO and PM2.5 was performed and determined that CO and PM2.5 emissions from the proposed Project are below the significance thresholds regardless of the baseline used.

Further, as outlined in 40 CFR 51, Appendix W, Section 9.2, the background data used to evaluate the potential air quality impacts need not be collected on the project site as long as the data are representative of the air quality in the subject area. The most representative background data is determined based on location, data quality and age of data and/ or in accordance with SCAQMD guidance. The background data from West San Gabriel Valley (Pasadena) and Central Los Angeles monitoring stations were selected for the air dispersion modeling in accordance with SCAQMD guidance and approval. These stations are the closest monitoring stations to the Project site, the data collection methods meet the data quality requirements of 40 CFR Part 58, Appendices A and B guidance, and the data have been collected within the preceding three years. Use of this data is therefore appropriate for the Project analysis

Potential Hazardous Air Pollutants and Health Risk

Local health risks are minimized due to the technology incorporated into the Project design (i.e., oxidation catalysts that reduce organic hazardous compounds) being proposed for the Project and also due to the large area of the landfill and surrounding open space. The Draft EIR contains results of a health risk assessment that was used to determine if increased health risks from the Project exceed significance thresholds established by Office of Environmental Health Hazard Assessment (OEHHA) and contained in

SCAQMD CEQA Guidelines. That assessment which is included in Appendix B of the Draft EIR identified the highest risk levels of any receptor location outside the landfill boundary and demonstrated that expected health risks are below the established significance thresholds.

Increase in Landfill Gas Production and Dioxin and Furan Compounds Emissions

Several commenters expressed concerns regarding the LFG production assumed in the Project is lower in quantity than more recent LFG production. Additionally, several commenters expressed concerns over the possibility of dioxin and furan compounds emissions from the Project.

Additional modeling analysis and health risk assessment were performed in response to comments received on the Draft EIR that evaluate an assumed increase in LFG volume and methane content as well as the presence of dioxin and furan compounds based on additional data not available for preparation of the MND. This modeling assumes the following parameters:

- LFG production was measured at 6,200 scfm and 135.26 MMBtu/hr. based upon a measured heating value of 363 Btu/cf (36 percent methane). Based on the updated quantity, the LFG will be utilized in the following simultaneously operated equipment:
    - Four reciprocating internal combustion engines: 105.36 MMBtu/hr;
    - Regenerative (regen) gas flare: 5 MMBtu/hr.; and
    - Flare system (remainder of the LFG): 24.90 MMBtu/hr.
- Los Angeles County Sanitation District has prepared an HRA in support of SCAQMD permitting for two new flares at Scholl Canyon Landfill pursuant with SCAQMD Rule 1118.1. In addition to not being required for SCAQMD permitting, the Los Angeles County Sanitation District HRA for the two new flares did not include dioxins and furans compound emissions because Los Angeles County Sanitation District is not required to test LFG for them and expects that if present in the LFG, dioxins and furans compounds would be destroyed by the high operating temperature of the flares. (Sam Shammas, P.E., Los Angeles County Sanitation District, Communication, July 13, 2021). Based on several reference documents, such as USEPA AP-42 chapter 2.4, CARB California Air Toxics Emission Factors (CATEF) database search, and SCAQMD AB2588 quadrennial Air Toxics Emission Inventory Procedures dated June 2020, dioxins and furans compounds emissions are not expected to come from internal combustion engines because the proposed engines will be equipped with oxidization catalysts that are designed to destroy organic emissions, including dioxins and furans. However, USEPA AP-42, chapter 2.4 draft report dated October 2008 shows possible dioxin and furans compounds from flares. To provide a conservative HRA, the health risk assessment for the Project was updated by including dioxins and furans compounds from the flare systems. The November 2018 source test conducted on the LFG combustion in the boiler at Grayson Power Plant was used to estimate the dioxins and furans emissions for purposes of evaluating potential air quality impacts of the Project, even though the LFG combustion at Grayson Power Plant was considerably less efficient than it will be in the Project's reciprocating internal combustion engines.. The source test shows an octachlorodibenzo-p-dioxin emission factor of 5.33E-10 lbs./mmcf. While the boilers at Grayson

Power Plant and the flares at Scholl Canyon Landfill are not equipped with emissions control systems capable of removing dioxins and furans, as noted above, the reciprocating internal combustion engines proposed for the Project would be equipped with oxidization catalysts that destroy dioxins and furans preventing their release into the atmosphere. The updated emission inventory for the Project is provided in Attachment A of the errata. Based on this data and analysis is can be reasonably concluded that there will be no air quality of human health risk from dioxins or furans from the Project.

- The landfill property boundary was revised in response to a SCAQMD comment and request to consider additional potential receptors. Specifically, the west property boundary of the landfill was reduced from what was considered in the MND to include Lower Scholl Canyon Park as an off-site receptor. Additionally, the north boundary of the landfill was reduced to include Scholl Canyon Golf course property as an off-site receptor. The adjustment to the landfill property boundaries did not result in any new potentially significant environmental impact or a substantial increase to a potential environmental impact previously disclosed in the Draft EIR.

- Ambient air quality background concentrations from the period originally analyzed (2014 through 2018) were revised to the period of 2015 through 2019 in accordance with SCAQMD guidance.

- Burbank Airport meteorological data was revised from the period originally analyzed (2008 through 2012) to the period of 2012 through 2016 in accordance with SCAQMD guidance.

Based on the updated parameters, air dispersion modeling for the ambient air quality analysis was performed pursuant with SCAQMD CEQA Air Quality Handbook and additional guidance from SCAQMD CEQA staff. The analysis also conforms with SCAQMD new source permitting policies. The following table shows the result of the updated analysis:

Ambient Air Quality Impact Analysis Result
Scholl Canyon Repowering Generation Project

Pollutant	Avg. Period	Project Impact	Background[a]	New Ambient	Limiting Standard	Type of Standard
NO_2[b]	1-HR	0.03702 ppm	0.0719 ppm	0.1089 ppm	0.18 ppm	CAAQS
NO_2[b]	1-HR (98th percent)	0.02083 ppm	0.0593 ppm	0.0801 ppm	0.10 ppm	NAAQS
NO_2[c]	Annual	0.00023 ppm	0.0154 ppm	0.0156 ppm	0.03 ppm	CAAQS
CO	1-HR	0. 1748 ppm	2.60 ppm	2.7748 ppm	20 ppm	CAAQS

Pollutant	Avg. Period	Project Impact	Background[a]	New Ambient	Limiting Standard	Type of Standard
CO	8-HR	0.0473 ppm	1.60 ppm	1.6473 ppm	9 ppm	CAAQS
PM10	24-HR	1.373 ug/m^3	96 ug/m^3	97.373 ug/m^3	Allowable increase of 2.5 ug/m^3	CAAQS / SCAQMD Allowable Increase
PM10[d]	24-HR (6th highest over 5 years)	1.046 ug/m^3	96 ug/m^3	97.046 ug/m^3	150 ug/m^3	NAAQS
PM10	Annual	0.193 ug/m^3	34.4 ug/m^3	34.593 ug/m^3	Allowable increase of 1.0 ug/m^3	CAAQS / SCAQMD Allowable Increase
PM2.5	24-HR	1.373 ug/m^3	30.5 ug/m^3	31.873 ug/m3	Allowable increase of 2.5 ug/m^3	CAAQS / SCAQMD Allowable Increase
PM2.5[e]	24-HR (8th highest)	0.956 ug/m^3	30.5 ug/m^3	31.456 ug/m3	35 ug/m^3 Below SIL of 1.2 ug/m^3	NAAQS EPA Significant Impact Level (SIL)
PM2.5	Annual	0.193 ug/m^3	12.58 ug/m^3	12.773 ug/m^3	Below SIL of 0.3 ug/m^3 Allowable increase of 1.0 ug/m^3	EPA Significant Impact Level (SIL) CAAQS / SCAQMD Allowable Increase
SO_2	1-HR	0.0032 ppm	0.018 ppm	0.0212 ppm	0.25 ppm	CAAQS
SO_2[f]	1-HR (99th percent)	0.00229 ppm	0.0094 ppm	0.0117 ppm	0.075 ppm	NAAQS

Pollutant	Avg. Period	Project Impact	Background[a]	New Ambient	Limiting Standard	Type of Standard
SO_2	24-HR	0.00071 ppm	0.002 ppm	0.0027 ppm	0.04 ppm	CAAQS

Notes:

b) Background values are based on the highest concentrations monitored at West San Gabriel Valley monitoring station (Station No. 088) during 2015 through 2019, except the PM10 and SO_2. The background values of PM10 and SO_2 were based on the readings from the Central Los Angeles monitoring station (Station No. 087) since the West San Gabriel Valley monitoring station did not record any background data for those pollutants. The selected monitoring station data reflects those stations closest to the project with applicable ambient analyzers in accordance with SCAQMD ambient air quality assessment guidelines and were confirmed with SCAQMD staff. SCAQMD maintains a network of monitoring stations located throughout the Basin for the purpose of informing the public of air quality and to support air quality impact analyses such as those conducted for the Project.

c) NO_2 1-hour modeling was refined using the AERMOD Ambient Ratio Method (ARM) option, which assumes an 80 percent conversion factor of NO_X to NO_2

d) NO_2 annual modeling was refined using the AERMOD ARM option, which assumed a 75% conversion factor of NO_X to NO_2.

e) PM10 24-hour modeled values were based on the maximum 6th highest concentration over 5 years period.

f) PM2.5 24-hour modeled values were based on the 8th highest concentration averaged over 5 years period with the background concentrations of 98th percentile of 24-hour data averaged over 5 years period.

g) SO_2 1-hour modeled values were based on the 4th highest concentration averaged over 5 years period with the background concentrations of 99th percentile of 1-hour data averaged over 5 years period.

h) There are receptors surrounding the facility at lower and higher elevations than the emission sources. The model reflects non-default option (flat terrain) on all receptors at lower elevations; and a default option (complex terrain) was selected to on receptors above the emission sources base elevation. The selected terrain options for both uphill and downhill receptors were selected in accordance with SCAQMD guidance because they provide the most conservative analysis results at each elevation.

As shown in the above table, the modeled highest concentration of NO_2, CO, and SO_2 plus the applicable background concentration did not result in any exceedances of the federal and state AAQS applicable to evaluating the Project's potential air quality impacts. For PM10 and PM2.5, the modeled maximum concentrations from the Project did not result in any exceedances of the state significant thresholds that are defined by SCAQMD. Attachment B of the errata includes additional information regarding model input / output files.

Natural Gas Augmentation

Several commenters noted that the Draft EIR reflected the assumption that natural gas would be used to supplement landfill gas in the internal combustion engines.

The Draft EIR reflected landfill gas analyses and collection rates that consistently declined in the 2014-2016 timeframe. The data supporting the Draft EIR reflects low gas collection volumes that are approximately 20% below historic averages for the landfill and methane content of less than 34%. With landfill gas methane content of less than 34%, small amounts of natural gas (approximately 3%-4% based upon BTU input) would likely be necessary to ensure efficient combustion by the internal combustion engines. Additionally, based upon initially projected landfill gas volumes and methane content, natural gas augmentation of up to 10% would allow for full utilization of the internal combustion engines and comply with SCAQMD regulations. For these reasons, natural gas augmentation of up to

10% was included in the MND. The assumed use of natural gas only affected emissions by increasing the total volume of fuel combusted in the engines, up to 100% capacity. Landfill gas emission factors were used to estimate emissions for the full utilization of the engines because doing so presented the highest potential impacts relative to air quality, health and climate.

The 2014-2016 data varies significantly when compared with historic trends for the Scholl Canyon Landfill. The 2014-2016 methane content observed at Scholl Canyon landfill is also uncharacteristic of similar landfills in the region. The landfill operator has since taken steps to enhance gas collection and to minimize air intrusion in the landfill gas stream at Scholl Canyon Landfill. As a result, both landfill gas collection volumes and methane content have increased since the MND was drafted. Based upon the improved collection system and updated models, adequate flows of gas with over 36% methane content are expected to exist for the foreseeable future.

The need for natural gas augmentation is expected to occur in the year 2045 because landfill gas methane content may fall below 34%. The model indicates, however, that at the time landfill gas methane content falls below 34%, the amount of total landfill gas generated at Scholl Canyon Landfill will also decline by approximately 20%. Even with natural gas augmentation, total fuel combustion at the facility would be lower than what is accounted for in the Draft EIR and also in line with what was reflected in the Draft EIR.

Dioxin and Furan Compounds

Several commenters expressed concerns over the possibility of dioxin and furan compounds emissions from the Project.

Dioxin and furan compound emissions were included in the Draft EIR analysis as a result of the landfill gas combustion in flare systems. USEPA AP-42, chapter 2.4 draft report dated October 2008 shows possible dioxin and furans compounds from flares, which are external combustion devices, rather than internal combustion devices such as the proposed engines.

AP-42 reference values in the USEPA Report reflect compounds that are thought possible to be present based upon emission source technologies and test results from such technologies (in this case, landfill flares). They do not reflect expectations for “all” landfills, nor do they reflect Scholl Canyon Landfill gas analyses or measurements of combustion emissions at the Scholl Canyon Landfill. To consistently utilize AP-42 references but also reflect data that is specifically relative to Scholl Canyon Landfill, the health risk assessment was updated by including dioxins and furans compounds that may be expected to be emitted by the flare systems. The source test conducted on the landfill gas combustion in the boilers at Grayson Power Plant was used to estimate the dioxins and furans emissions, rather than referring to AP-42 emission factors for the flares. Both the boilers and flares reflect external combustion sources without emission controls systems. The updated emission inventory is provided in Attachment A.

Based on several reference documents, such as USEPA AP-42 chapter 2.4, CARB California Air Toxics Emission Factors (CATEF) database search, and SCAQMD AB2588 Quadrennial Air Toxics Emission Inventory Procedures dated June 2020, dioxin and furan compounds emissions are not shown to be

emitted from internal combustion engines when burning landfill gas. Additionally, the fuel treatment system that will be used to remove siloxane compounds and particles such as metals from the landfill gas can also be designed to remove dioxins and furans, as well as compounds that may be precursors to dioxins and furans. The proposed engines will also be equipped with oxidation catalysts to destroy organic emissions, including dioxins and furans. For these reasons, dioxins and furans are accounted for only in the flares and not the internal combustion engines.

Health Risk Assessment

Based upon the updated LFG production and air dispersion models, a health risk assessment (HRA) was conducted to evaluate the potential cancer, chronic, and acute health impacts from the Project. The HRA was prepared in accordance with OEHHA guideline dated February 2015 and SCAQMD Risk Assessment Procedures for Rule 1401, 1401.1, and 212 Version 8.0 dated September 1, 2017. Two software programs, AERMOD and HARP2, were utilized for the HRA. AERMOD is an air dispersion model that was used to estimate the ground level TAC concentrations and the Hotspots Analysis and Reporting Program (HARP2) was used to estimate the cancer and non-cancer health impacts for individual receptors using ground level concentration data for multiple pollutants through multiple pathways. HARP2 was developed by OEHHA to estimate health risks. The model reflects OEHHA guidelines on potency and exposure thresholds for known toxic air contaminants.

Additionally, an updated health risk assessment was performed in response to SCAQMD comments to determine the increased health risk from the flaring operations that were not initially envisioned. As with the previous risk assessment for the Project, the updated risk assessment was conducted in accordance with SCAQMD and OEHHA guidelines. The results of the updated assessment continue to demonstrate that health risks attributed to the project are below significance thresholds.

The following table summarizes the highest maximum individual cancer risk (MICR), hazard index acute (HIA), and hazard index chronic (HIC) values at any receptor locations outside the facility boundary.

HEALTH RISK ASSESSMENT RESULT

Equipment	Cancer Risk	Chronic Health Index	Chronic 8-hour Health Index	Acute Health Index	OEHHA and SCAQMD Cancer Risk Significance Threshold	OEHHA and SCAQMD Chronic/ Acute Significance Threshold
Project	0.26E-06	0.016	0.0008	0.0076	10.00E-06	1.00

Note: The cancer risk, chronic health index, chronic 8-hour health index, and acute health index values of the proposed Project which were modeled pursuant with Office of Environmental Health Hazard Assessment (OEHHA) Guideline and SCAQMD Risk Assessment Procedures for Rule 1401, 1401.1 and 212. are the highest values of any receptors outside the landfill property boundary. Since the values are already below the SCAQMD significance threshold of 10E-06 for cancer risk and 1.00 for the health index, no further analysis was conducted to obtain readings at the nearest residential or worker receptors. Risks at residential and worker receptor locations would be lower than those reflected in the table.

Pursuant to SCAQMD Rule 1401, cancer burden is defined as the estimated increase in the occurrence of cancer cases in a population subject to a MICR of a greater than or equal to one in one million resulting from exposure to toxic air contaminants. As shown in the above table, the highest MICR at any receptors outside the landfill property boundary is less than one in one million. Therefore, the cancer burden analysis is not necessary because the cancer burden would be zero cancer cases. Attachment C of the errata includes additional information on the health risk assessment analysis.

Air Quality Impact of the Project when the Landfill is Closed and Converted to Recreational Use

Several commenters expressed concerns regarding the air quality impact of the Project when the Scholl Canyon Landfill is closed and converted to recreational use. It is expected there will be a transitional period where the power generation facility will continue to be operated after the landfill has been converted to recreational use.

Air dispersion modeling and health risk assessment were performed to determine potential air quality and health impacts within the existing landfill boundaries and to determine the extent to which future public access could be granted. All the modeling parameters of the on-site analysis are identical to the updated analysis discussed in the previous section, with the exception of the assumed facility boundary. In the on-site assessment, the facility boundary was assumed to be the boundary of the industrial operation, rather than the broader boundary of the landfill to consider a future recreation land use adjacent to the power generation facility after landfill closure.

The following table shows the result of the analysis of impacts within the landfill property.

POST LANDFILL CLOSURE – RECREATIONAL USE AMBIENT AIR QUALITY IMPACT ANALYSIS RESULTS

Pollutant	Avg. Period	Project Impact	Background[a]	New Ambient	Limiting Standard	Type of Standard
NO_2[b]	1-HR	0.08361 ppm	0.0719 ppm	0.1555 ppm	0.18 ppm	CAAQS
NO_2[b]	1-HR (98th %)	0.06448 ppm	0.0593 ppm	0.1238 ppm	0.10 ppm	NAAQS
NO_2[c]	Annual	0.00189 ppm	0.0154 ppm	0.0173 ppm	0.03 ppm	CAAQS
CO	1-HR	0. 7748 ppm	2.60 ppm	3.3748 ppm	20 ppm	CAAQS
CO	8-HR	0.2034 ppm	1.60 ppm	1.803 ppm	9 ppm	CAAQS

Pollutant	Avg. Period	Project Impact	Background[a]	New Ambient	Limiting Standard	Type of Standard
PM10	24-HR	11.73 ug/m^3	96 ug/m^3	107.73 ug/m^3	Allowable increase of 2.5 ug/m^3	CAAQS / SCAQMD Allowable Increase
PM10[d]	24-HR (6th highest over 5 years)	8.255 ug/m^3	96 ug/m^3	104.26 ug/m^3	150 ug/m^3	NAAQS
PM10	Annual	1.779 ug/m^3	34.4 ug/m^3	36.179 ug/m^3	Allowable increase of 1.0 ug/m^3	CAAQS / SCAQMD Allowable Increase
PM2.5	24-HR	11.73 ug/m^3	30.5 ug/m^3	42.23 ug/m3	Allowable increase of 2.5 ug/m^3	CAAQS / SCAQMD Allowable Increase
PM2.5[e]	24-HR (8th highest)	8.027 ug/m^3	30.5 ug/m^3	38.53 ug/m3	35 ug/m^3 Below SIL of 1.2 ug/m^3	NAAQS EPA Significant Impact Level (SIL)
PM2.5	Annual	1.779 ug/m^3	12.58 ug/m^3	14.359 ug/m^3	Below SIL of 0.3 ug/m^3 Allowable increase of 1.0 ug/m^3	EPA Significant Impact Level (SIL) CAAQS / SCAQMD Allowable Increase
SO_2	1-HR	0.018 ppm	0.018 ppm	0.036 ppm	0.25 ppm	CAAQS
SO_2[f]	1-HR (99th %)	0.0121 ppm	0.0094 ppm	0.0215 ppm	0.075 ppm	NAAQS
SO_2	24-HR	0.00441 ppm	0.002 ppm	0.0064 ppm	0.04 ppm	CAAQS

Notes:

a) Background values are based on the highest concentrations monitored at West San Gabriel Valley monitoring station (Station No. 088) during 2015 through 2019, except the PM10 and SO_2. The background values of PM10 and SO_2 were based on the readings from the Central Los Angeles monitoring station (Station No. 087) since the West San Gabriel Valley monitoring station did not record any background data for those pollutants.

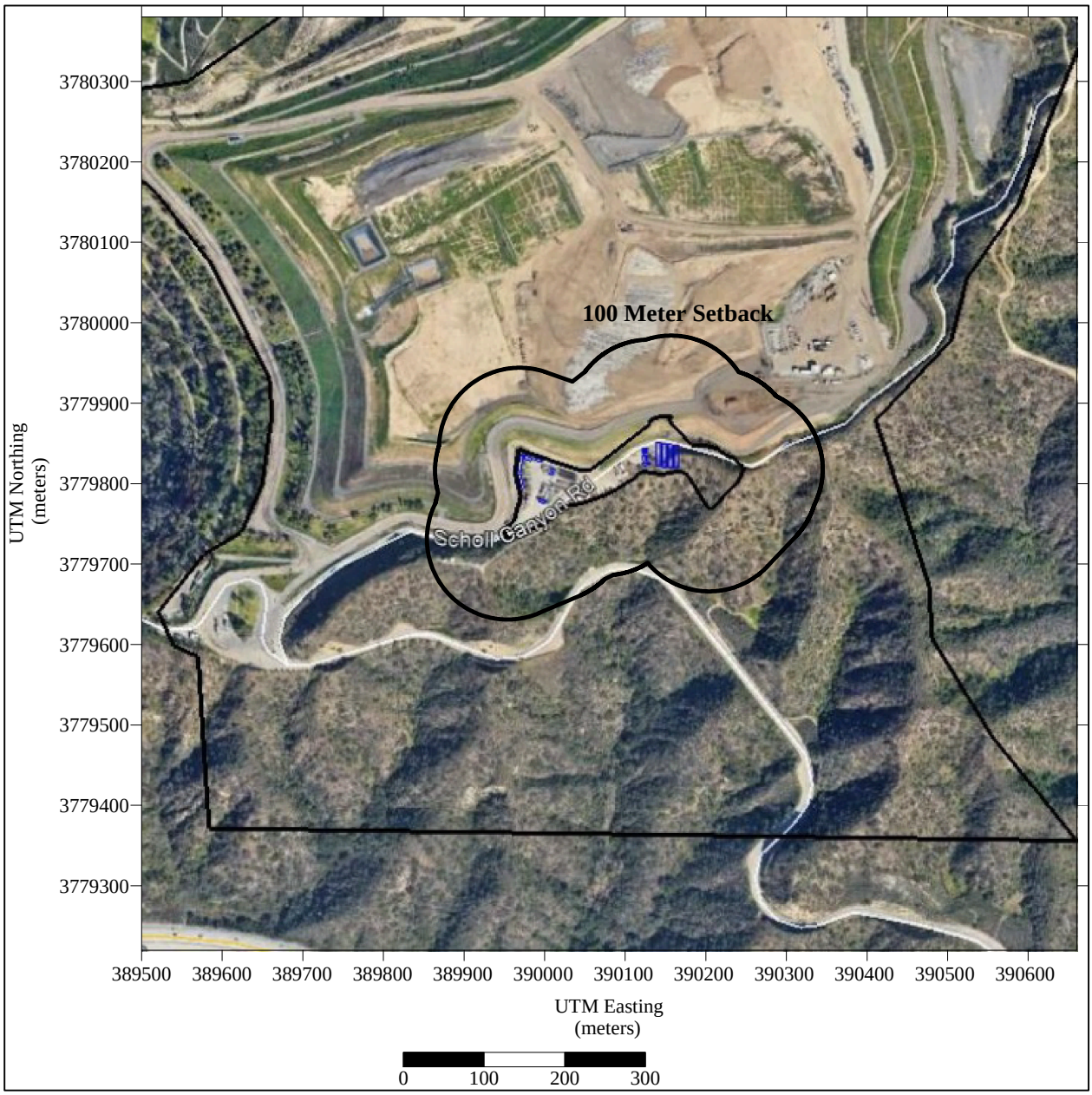
b) NO_2 1-hour modeling was refined using the AERMOD Ambient Ratio Method (ARM) option, which assumes an 80 percent conversion factor of NO_X to NO_2
c) NO_2 annual modeling was refined using the AERMOD ARM option, which assumed a 75 percent conversion factor of NO_X to NO_2.
d) PM10 24-hour modeled values were based on the maximum 6th highest concentration over 5 years period.
e) PM2.5 24-hour modeled values were based on the 8th highest concentration averaged over 5 years period with the background concentrations of 98th percentile of 24-hour data averaged over 5 years period.
f) Pursuant with federal requirements, SO2 1-hour modeled values were based on the 4th highest concentration averaged over a five-year period with the background concentrations of 99th percentile of 1-hour data averaged over a 5 year period pursuant to 40 CFR Part 50.

As shown in the table above, the modeled highest concentrations of the following pollutants exceed the ambient air quality standards:

- NO_2 in one-hour averaging period plus the applicable background concentrations exceeded the federal ambient air quality standard.
- PM10 and PM2.5 in annual averaging period exceeded the federal standard of allowable increase of 1.0 ug/m3.
- PM10 and PM2.5 in 24-hour averaging period exceeded the California standard of allowable increase of 2.5 ug/m3.
- PM2.5 in 24-hour averaging period plus the applicable background concentrations exceeded the California ambient air quality standard.

Since potential on-site exceedances of certain ambient air quality were identified, further analysis was conducted to measure the distance from the facility boundary at which point no exceedances of federal and state ambient air quality standards or significance thresholds. The model results show that a boundary of approximately 100 meters surrounding the generating facility would suitably ensure that future public access to the remainder of the landfill property could be granted. The following diagram illustrates the property boundary with no exceedances.

BIOGAS POWER GENERATING FACILITY SITE MAP



Attachment B of the errata includes additional information regarding model input / output files. Complete modeling files are available in electronic format.

Post Landfill Closure Health Risk Assessment

Based on the power generation facility property boundary, the following table shows the maximum MICR, HIA, and HIC values at any receptor locations, including potential public access space on the landfill.

POST LANDFILL CLOSURE HEALTH RISK ASSESSMENT RESULT

Equipment	Cancer Risk[2]	Chronic Health Index	Chronic 8-hour Health Index	Acute Health Index	Cancer Risk Significance Threshold	Acute / Chronic Risk Significance Threshold
Project	7.80E-06	0.17	0.028	0.26	10.00E-06	1.00

Note:
1. The cancer risk, chronic health index, chronic 9-hour health index, and acute health index values of the proposed Project shown in the table are the highest values of any receptors outside the landfill property boundary. Since the values are already below the significance threshold of 10E-06 for cancer risk and 1.00 for the health index, no further analysis was conducted to obtain readings at the nearest residential or worker receptors.
2. The health risk assessment shows the MICR values of 7.80 in a million at any receptors outside the power generation facility. Since the landfill is expected to be used only for recreational use not residential homes or workers, the MICR values of the Project are expected to be lower than 7.80 in a million at further receptor locations.

As shown in the above table, the health risk assessment shows the maximum MICR, HIA, and HI values at any receptor locations outside the property boundary are below the significance thresholds. Similar to previous section, cancer burden is expected to be zero cases because there is no population subject to a MICR of greater than or equal to one in one million. Attachment C of the errata includes additional information on the health risk assessment analysis.

The modeling analysis and health risk assessment were performed under the assumption that the landfill will ultimately be closed and converted to recreational use.

Greenhouse Gases

Increased landfill gas production

As explained in the above section, modeling analysis and health risk assessment were performed with increased LFG production of 6,200 scfm and 135.26 MMBtu/hr. based upon a measured heating value of 363 Btu/cf (36 percent methane). Therefore, GHG emissions of the Project were revised with the updated LFG production. The following table shows the net emission increase of greenhouse gases due to the Project. The increase in GHG emissions continues to be 310 mt/yr. CO_2e as stated in the Draft EIR. This increase is attributed to short-term emissions from heavy equipment and worker trips during the construction phase of the project and subsequent worker occupancy of the facility. These is no increase in on-site GHG emissions attributed to the operating phase of the Project, however off-site emissions attributed to maintenance and other staff transit are expected. A GHG emission inventory is provided in the Attachment D of the errata.

GHG EMISSIONS

Device/Activity	CO2 (MT/year)	CH4 (MT/year)	N2O (MT/year)	Total CO2e (MT/year)
Project[1]	61,696	3.79	0.75	62,013
Construction	257	0.06	0	258
Facility Occupants[2]	49	0.12	0.001	52
Baseline (Flares)	61,696	3.79	0.75	62,013
Net Emission Increase	306	0.18	0.001	310

Note:

[1]The Project GHG emissions were based on the landfill production rate of 6,200 scfm and operating schedule of 8,760 hours per year. This LFG is combusted in four engines, regen flare system, and the existing flare system.

[2]Facility Occupants include workers at the Power Generation Facility and existing adjacent gas collection facilities.

Need to Burn Landfill Gas and Relative Greenhouse Gas Emissions

Several commenters expressed concern regarding the need to burn LFG and the resulting GHG emissions from the Project.

Un-combusted LFG contains GHG emissions including carbon dioxide and methane. Based on the updated LFG production rates of 6,200 scfm, the Scholl Canyon Landfill produces approximately 44,000 metric tons of carbon dioxide and 18,000 metric tons of methane annually if not combusted. Methane emissions are especially important because the global warming potential of methane is approximately 25 times greater than that of carbon dioxide. In other words, 18,000 metric tons of methane emissions are equivalent to approximately 450,000 metric tons of carbon dioxide emissions as a contributor to global warming potential impacts. When both the methane and carbon dioxide content of the LFG are considered, Scholl Canyon Landfill generates approximately 490,000 metric tons of CO_2e per year.

The combustion of LFG is an effective way to destroy methane emissions and lower overall GHG emissions from landfill operations. Both SCAQMD and USEPA require LFG to be combusted. Based upon projected emissions for the Project, methane emissions from the combustion of Scholl Canyon Landfill gas are approximately 4.0 metric tons per year. The Project would reduce methane emissions by more than 99 percent. The final CO_2e emissions of the Project are estimated to be approximately 62,000 metric tons per year, an overall 87 percent reduction from the un-combusted LFG.

Inclusion of Grayson Power Plant Greenhouse Gas Emissions in an Analysis of Baseline Conditions

Several commenters expressed concern regarding the consideration of historic GHG emissions from the Grayson Power Plant as a baseline for determining significance of the Project.

In determining whether a project's impacts are significant, the Draft EIR compared the Project impacts to those impacts with existing environmental conditions. This baseline consists of the physical conditions that exist in the area affected by the Project at the time Project environmental analysis commences (at time of notice of preparation or commencement). The lead agency has the discretion to treat historical conditions or conditions that predate publication of the notice of preparation or commencement of the analysis as the baseline for analyzing impacts if there are reasons for doing so that are supported by substantial evidence. In this case, the area affected by GHG emissions is global in scope and the impacts are not dependent upon the precise location of the GHG emission sources.

The City discontinued the practice of combusting gas produced at Scholl Canyon Landfill in the Grayson Boilers in 2018. Nevertheless, the baseline CO2e emissions are the same regardless of the method of combustion (Grayson Boilers versus Scholl Canyon Flares versus Project) because the same LFG is being combusted.

The Project serves to combust LFG generated by the Scholl Canyon Landfill. Through the combustion process, the Project serves three purposes. First, the Project destroys methane emissions and reduces greenhouse gas emissions as discussed in the preceding section of this Topical Response. Second, the Project also destroys volatile organic gases (VOCs) and organic hazardous compounds through the combustion process. Third, the Project uses the renewable energy produced through the combustion of LFG to generate electricity. All three of these functions occurred when LFG from Scholl Canyon Landfill gas was burned in the Grayson Power Plant boilers.

The Project will consume LFG from the Scholl Canyon Landfill that was combusted at the existing Grayson Power Plant until 2018 and subsequently combusted at the Scholl Canyon Landfill Flares. Implementation of the Project will result in that same LFG being combusted at Scholl Canyon; accordingly, the Project will not increase the amount of LFG being produced or combusted and does not alter the ultimate impacts of GHG emissions from combusting the LFG. (See Air Quality and GHG emissions information above in this Topical Response). In addition, if the Project were not built, the Scholl Canyon Landfill gas would continue to be incinerated in the landfill flares.

9.2.6 Topical Response 6: Geology and Soils

Summary of Comments

Comments received expressed concern in regard to:

- Earthquake potential and Project vicinity to active faults.

- The amplification of seismic waves in a mountain setting.
- Impact to Project facilities in the event of an earthquake directly beneath the landfill.
- The dangers of processing methane at the Project site.
- Mitigation measures for landslides on exposed faces of the landfill and liquefaction at Scholl Canyon Park.
- Groundwater contamination due to the landfill being unlined and located on fractured bedrock.
- Emergency backup systems and mitigation measures for threats to power equipment, buildings, tanks, and pipelines.
- Pipeline rupture in the event of an earthquake and the effects it will have on areas outside of Glendale.

Responses

In determining whether a project's impacts are significant, the Draft EIR compares project impacts to those impacts with existing environmental conditions. This baseline consists of the physical conditions that exist in the area affected by the project at the time project environmental analysis commenced (specifically, at time of notice of preparation was issued). Assessment of the project's impacts is normally limited to changes in those existing physical conditions in the area affected by the project (14 Cal Code Regs section 15125(a). Accordingly, CEQA does not limit environmental analysis by jurisdictional boundary.

According to the Safety Element of the Glendale General Plan, "The City shall require geological studies as part of development proposals for critical facilities if such facilities are proposed within the Fault Hazard Management Zones of the Verdugo, Mt. Lukens, Hollywood and Sycamore Canyon faults as shown on Plate P-1 (Program 1-2.2 of Section 3.1.3)." The Project site does not fall within any of these Fault Hazard Management Zones. However, as stated in Section 4.5.4 of the Draft EIR, the closest active or potentially active earthquake fault is the Verdugo Fault located 0.3 miles to the southwest of the Project site. Therefore, a deterministic seismic hazard assessment was performed for the Project including ground motion estimates from a postulated M_w 6.9 earthquake on the Verdugo Fault per the maximum recorded moment magnitude by the United States Geological Survey (USGS)/CGS 2008 Fault Model. The Verdugo Fault trace in this model comprises the Verdugo-Eagle Rock-San Rafael fault system. Based on this assessment and other available geologic data, there is low potential for surface fault rupture from the Verdugo Fault and other nearby active faults propagating to the surface of the Project site. Additionally, there is no mapped fault that runs directly beneath the Project site and therefore the potential for an earthquake to originate from directly beneath the Project site is low. Furthermore, no evidence for surface rupture has been observed along Eagle Rock and San Rafael Faults (Weber et al., 1980).

CEQA does not require that an agency conduct every recommended test and perform all recommended research in evaluating a project's environmental impacts (14 Cal Code Regs §15204(a)); See also, *Bay Area Citizens v Association of Bay Area Gov'ts* (2016) 248 CA4th 966, 1017; *Society for Cal. Archaeology v County of Butte* (1977) 65 CA3d 832. See also *Association of Irritated Residents v County of Madera* (2003) 107 CA4th 1383, 1396; *Cadiz Land Co. v Rail Cycle* (2000) 83 CA4th 74, 102; *Riverwatch v County of San Diego* (1999) 76 CA4th 1428, 1447. Therefore, where there is no substantial evidence supporting the need for additional studies to determine the potential extent of geologic impacts on the project, and the research and analysis provided are adequate, no additional studies are necessary. Moreover, the Project would be designed and constructed in accordance with the applicable California Building Code, ASCE 7, and the Glendale Building and Safety Code which considers the risk of seismic events impacting facility structures. All structures will be designed in accordance with the current edition of the California Building Code and Glendale Building and Safety Code that is in effect at the time the facility is designed and not to codes or standards that have yet to be adopted or go into effect. The California Building Code (CBC) 2016 edition references ASTM 7-10. The next edition of the CBC (CBC 2019) will then reference ASTM 7-16. Therefore, any impact to Project facilities in the event of an earthquake from the nearest potential source, as well as potential increased seismic amplification due to topographical setting, is considered less than significant following applicable building codes and standards.

A requirement that a project comply with specific laws or regulations may also serve as adequate mitigation of environmental impacts in an appropriate situation. As the court explained in *Oakland Heritage Alliance v City of Oakland* (2011) 195 CA4th 884, 906, "a condition requiring compliance with regulations is a common and reasonable mitigation measure and may be proper where it is reasonable to expect compliance." In this case, the court upheld the city's reliance on standards in the building code and city building ordinances to mitigate seismic impacts. The Guidelines specify that reliance on compliance with a regulatory permit or similar process is sufficient mitigation if compliance with such standards can be reasonably expected, based on substantial evidence, to reduce the impact to the specified performance standard. (14 Cal Code Regs §15126.4(a)(1)(B)).

Processing Methane and Potential Leakage of Dangerous Contaminants from the Landfill

There will not be a substantial increased risk from combusting the LFG in the Project compared to existing conditions which already involve LFG collection and combustion in the onsite flares. Further, Project construction will include automatic seismically triggered shutoff valves on both the new natural gas line at the meter box and on the connection to the existing LFG pipeline. These automatic shut off valves will stop the flow of gas in the event of a seismic event. Therefore, there will be a less than significant potential for a gas leak and explosion at the Project as the result of an earthquake.

Volatile Organic Compounds and Other Contaminants Have Seeped Below the Subsurface

The Project would be located on a “non-fill” area of the Scholl Canyon Landfill site and not on top of the existing landfill material deposits. The subsurface at the Project site consists of very dense silty sands over slightly weathered, hard bedrock and would not have any foundation or other facilities that would penetrate the landfill or have any impact on volatile organic compounds and other contaminants that exist

below the subsurface. The purpose of the existing LFG collection facilities is the removal and destruction of volatile organic compounds from the subsurface.

Fault Rupture Hazard

As specified on page 5.3 of Appendix D: Geotechnical Investigation Report of the Draft EIR, the Project is not located within a currently mapped California Earthquake Fault Zone. While the nearest fault is the Verdugo Fault, located approximately 0.3 miles southwest of the site, based on available geologic data, there is low potential for surface fault rupture from the Verdugo Fault and other nearby active faults propagating to the surface of the site. However, in the event of an earthquake, the LFG and natural gas fuel supplies supporting the Project would be shut down by automatic seismically triggered shutoff valves installed as part of the design of the Project and would not represent a substantial fire/explosion risk. (See above re compliance with regulatory conditions).

Liquefaction and Seismically Induced Settlements

Subsurface conditions underlying the site consist mainly of dense to very dense silty sands over slightly weathered, hard bedrock. In addition, the groundwater level is very deep. The Project is located within an area where water bearing soils are not present. Consequently, the potential for liquefaction beneath this Project is negligible.

The Project is located approximately half a mile from Scholl Canyon Park. Scholl Canyon Park is situated over solid bedrock and the Project would have no effect on any geological or soil conditions at Scholl Canyon Park.

Specifics on the Project's foundation design, foundation construction, concrete slab-on-grade floor plans, permanent retaining walls, pavement design, expansive soil potential, corrosive soil potential, site preparation and grading, and post investigation services in place to support the design and construction of the Project are discussed in Section 7.0, Conclusions and Recommendations, of the Geotechnical Investigation Report provided as Appendix D to the Draft EIR. These Project plans and documents were analyzed as part of the Project description in the Draft EIR.

Landslides on Exposed Faces of the Landfill

For information regarding the potential impacts of landslides to the Project, please refer to Section 4.5.4, Geology and Soils, Project Impacts, of the Draft EIR.

A cut native slope is proposed at the northeast end of the proposed Project site. At present, the slope is configured at 1.5:1 (horizontal: vertical). Standard erosion protection measures such as a drainage swale or bench (one at the top and one approximately mid-way down on the face of the slope) incorporated into the proposed Project design will reduce the potential for sloughing and raveling from the face of the slope. Project compliance with design requirements set forth by Uniform Building Code and the City's Building and Safety Code will ensure maximum slope steepness is not exceeded.

The gas line would be routed above-ground except for at road crossings where the gas line would be buried to avoid conflict with vehicular/equipment use of the road. The gas line would primarily follow existing landfill roadways and down an existing terraced, engineered slope on an existing pipe rack to an existing SoCalGas meter. The existing terraced hillside is heavily landscaped and contains numerous storm water conveyance structures which serve to dissipate water flow and stabilize the slope.

Emergency Backup Systems

The Project would be remotely monitored through a Supervisory Control and Data Acquisition (SCADA) system. The SCADA system includes software and hardware elements that would allow the equipment to be monitored and controlled from the remote locations. Project operations would be remotely monitored using monitoring centers in Brea, California and Bristol, Pennsylvania. An alarm would be triggered at the power generation facility and at the remote monitoring locations in the event of an upset operating condition. The City's on-call staff would be immediately notified and called-out for operation and maintenance support. Extensive hands-on training would be provided to City operators who will also have access to the monitoring system. If needed, in an emergency, the engines can be completely shut off either manually or via remote access. The facility would be constructed with a battery uninterruptable power source designed to provide sufficient power to allow for the safe shutdown of the Project in the event of an emergency. In the event of Project shutdown, the facility will revert to baseline conditions and the methane will be flared using the existing flares onsite.

9.2.7 Topical Response 7: Hazards and Hazardous Materials

Summary of Comments

Comments were received stating concern that the Project could result in a fire, explosion and/or release of hazardous materials that would create a substantial hazard to public and property.

Summary of Response

The Project includes a fire protection system that complies with all applicable national, state, and local fire codes. The fire protection system has been reviewed and approved by the City of Glendale Fire Department, as the Certified Unified Program Agency. For additional information regarding wildfires and fire hazards please refer to Topical Response 9, below. The Potential Impact Radius of an explosion originating from the proposed natural gas pipeline is 9.26 feet. Considering that there are no residences or other habitable structures within the Potential Impact Radius and the pipeline is in a location not open to public access, a pipeline explosion would have a low risk of resulting in death, injury, or significant property damage. Moreover, in the post-closure scenario, a buffer zone around the Project will be maintained which will ensure any risk from pipeline explosion remains low.

The City proposes to replace the originally proposed anhydrous ammonia with R134a refrigerant or equivalent as allowed by CARB and SCAQMD, in the chiller system, and use 19-percent aqueous ammonia in the Selective Catalytic Reduction process to control emissions. R134a refrigerant is not a hazardous material and is commonly used instead of anhydrous ammonia which is a hazardous material. Accordingly, using R134a refrigerant or equivalent in the chiller system would not represent a substantial

health risk were it inadvertently released during equipment damage or failure. The Project would also utilize and store up to 10,000 gallons of 19-percent aqueous ammonia to achieve emissions control limits established by SCAQMD. According to the Clean Air Act regulations (40 CFR 68, Section 112(r)), the threshold of aqueous ammonia above which this chemical presents a risk for formation of toxic plume is 20,000 gallons of solution and use of aqueous ammonia of concentration that exceeds 20 percent. The proposed aqueous ammonia volume and concentration are lower than the regulation threshold levels. The analyses in Section 4.7 of the Draft EIR demonstrate use of R134a refrigerant, or equivalent, and 19-percent aqueous ammonia would result in less than significant hazards and hazardous materials impacts.

Response

Explosion Hazard from Natural Gas and Existing Biogas Pipeline

The Project's three-inch diameter natural gas pipeline would be designed in accordance with applicable pipeline safety standards and would be installed above ground except at road crossings. United States Department of Transportation, Pipeline and Hazardous Materials Safety Administration developed an equation that estimates the distance from a potential natural gas pipeline explosion at which death, injury, or significant property damage could occur. This distance is known as the "Potential Impact Radius". The Potential Impact Radius is calculated by the formula $r = 0.69*$ (square root of $(p*d^2)$), where 'r' is the radius of a circular area in feet surrounding the point of pipeline failure, 'p' is the maximum allowable operating pressure in the pipeline in pounds per square inch and 'd' is the nominal diameter of the pipeline in inches.

The natural gas pipeline proposed as part of the Project would have a maximum operating pressure of 20 pounds per square inch and a diameter of three inches. The distance from an explosion at which death, injury, or significant property damage could occur is 9.26 feet. Considering that there are no residences, other habitable structures, or areas of substantial public attraction within the Potential Impact Radius, a pipeline explosion would have a low risk of resulting in death, injury, or significant property damage. The natural gas pipeline would be located west of the area considered for post-landfill closure recreation land use and would not represent a public safety risk for future recreation/open space land uses required by the JPA. The Project would result in decommissioning the existing 5.5-mile-long LFG pipeline from the Scholl Canyon Landfill to Grayson Power Plant. That pipeline has a maximum operating pressure of 50 pounds per square inch, a diameter of 14 inches, and a resulting distance from a potential explosion at which death, injury, or significant property damage could occur of 46 feet (Compliance Services Inc., 2016)[78]. Implementation of the Project includes decommissioning the existing LFG pipeline and therefore eliminating risks associated with a potential explosion from that pipeline.

Ammonia Hazard

The Draft MND for the Project evaluated the potential hazards associated with a proposed 3,000-gallon capacity anhydrous ammonia refrigerant chiller system. The proposed facility cooling system would have

[78] Compliance Services Inc., 2016, Part 192 Jurisdictional, Class Location, & High Consequence Area Analysis, Scholl Canyon Landfill Biogas Pipeline. Note: Calculation of Potential Impact Radius considers a natural gas factor specific to the LFG).

contained less than 10,000 pounds of anhydrous ammonia and risks from an upset condition were determined to be low. However, as determined in Section 4.7.4 of the Draft EIR, the anhydrous ammonia would be replaced with R134a refrigerant, or equivalent, as allowed by CARB and SCAQMD, in the chiller system. R134a refrigerant is not a hazardous material and is commonly used instead of anhydrous ammonia which is a hazardous material. This substitution eliminates potential hazard associated with anhydrous ammonia and would not create any new environmental impacts, worsen the effect of any environmental impacts, or require mitigation measures.

The Project would use 19-percent aqueous ammonia in the Selective Catalytic Reduction process to control emissions of nitrogen oxides from the generation equipment. According to the Clean Air Act Regulations (40 CFR 68, Section 112(r)), the threshold of aqueous ammonia above which this chemical presents a risk for formation of toxic plume is 20,000 gallons of solution and use of aqueous ammonia of concentration that exceeds 20 percent. The proposed aqueous ammonia volume and concentration are lower than the regulation threshold levels. The 19-percent aqueous ammonia would be stored in up to a 12,000-gallon capacity above ground storage tank. The tank would be surrounded by a secondary concrete containment structure that measures 38.5 feet long, 13.5 feet wide and 4.5 feet deep. The secondary containment structure can hold the entire contents of the tank, plus rainwater accumulation. The California Accidental Release Program regulates the use of aqueous ammonia with a concentration of one percent or greater if a threshold quantity of 500 pounds of ammonia is reached.

An offsite consequence analysis was performed for a hypothetical worst-case accidental release of aqueous ammonia using the USEPA approved Lawrence Livermore National Laboratory Atmospheric Dispersion Model for Denser-Than-Air-Releases (SLAB Model). The analysis assumed the complete failure of the storage tank, the immediate release of the contents of the tank and the formation of an evaporating pool of aqueous ammonia within the secondary containment structure. Under this scenario, evaporative emissions of ammonia would be subsequently released into the atmosphere. The dispersion and transport of these emissions into the atmosphere would be subject to meteorological conditions at the time of the release. To be conservative, worst-case meteorological data were used in the offsite consequence analysis pursuant with USEPA's Risk Management Program Guidance for Offsite Consequence Analysis (EPA, 2009)[79].

To provide a conservative analysis of potential offsite consequences of an ammonia release, a concentration of 75 parts per million ammonia considered by the California Energy Commission to be the concentration the public could be exposed to during a one-time event without experiencing serious adverse effects was used for screening purposes. For comparison, the Occupational Safety and Health Administration's Immediately Dangerous to Life and Health concentration for ammonia is 300 parts per million and USEPA's Accidental Release Prevention Program Toxic Endpoint concentration for ammonia is 200 parts per million. As it relates to the Project, a concentration of ammonia exceeding 75 parts per million beyond the Scholl Canyon Landfill property boundary would be considered a potentially significant impact.

[79] EPA. 2009. Risk Management Program Guidance for Off-site Consequence Analysis. Available: https://www.epa.gov/sites/production/files/2013-11/documents/oca-chps.pdf.

The results of the offsite consequence analysis for the worst-case release of ammonia indicate that the 75 parts per million concentration, would extend approximately 150 feet from the ammonia tank/release. This distance would not extend beyond the Scholl Canyon Landfill property boundary, and therefore such a condition represents a low public safety risk and would be a less than significant impact not requiring any mitigation. Future recreation land use in adjacent areas after landfill closure could be expected to have a 150-foot buffer from the Project boundary for public safety considerations in the event of a worst-case accidental release of aqueous ammonia. However, this buffer would represent a small area compared to that available for recreation and would be consistent with the requirements of the JPA.

9.2.8 Topical Response 8: Noise and Transportation

Summary of Comments

Comments received stated concern regarding the potential for noise and transportation and traffic impacts during Project construction and operation. Comments included concern for exacerbating the use of the Figueroa corridor during construction, Los Angeles County Operational Area Disaster Routes being impacted in the event of a major accident at Scholl Canyon Landfill, public safety related to an increase in truck traffic, illegal dumping in residential neighborhoods adjacent to the landfill, and cumulative traffic impacts. Additionally, commenters requested that Project impacts related to noise, traffic, and transportation be evaluated in relation to vehicle miles traveled (VMT).

Response

<u>Noise and Transportation Impacts Were Analyzed in the Draft EIR</u>

Potential noise and transportation and traffic Project impacts were analyzed in Sections 4.10 and 4.11 of the Draft EIR, respectively. The analysis included noise and traffic studies (Appendix J and K of the Draft EIR) and studied the Project's contribution to cumulative impacts. These analyses (which included Project vehicle trips on Figueroa Street) demonstrate the Project would have less than significant Project-specific and cumulative noise and traffic impacts.

<u>Noise</u>

The locations selected for collecting ambient noise measurements to determine representative existing noise levels for the Project were based on the nearest location of sensitive residential land uses in closest proximity to the Project. These residential land uses would have the greatest potential to be impacted by Project noise and are most appropriate for evaluating potential worst-case noise impacts of the Project on surrounding sensitive receptors. As shown in Table 35 of the Draft EIR, the nearest residential receptors are more than 2,000 feet from the Project site. The discussion below also demonstrates that noise from Project operation would not have a potentially significant noise impact to adjacent future recreation/open space land uses required by the JPA after landfill closure.

The demolition phase would involve construction equipment/activity resulting in the highest level of construction noise levels and therefore, was used to analyze the worst-case potential construction noise impacts of the Project. Results of construction and operation phase noise modeling conducted for the

Project and summarized in Tables 40 and 41 of the Draft EIR demonstrate that the Project would not exceed the applicable noise thresholds of significance.

Table 37 of the Draft EIR has been revised to be consistent with the predicted construction noise levels summarized in Table 41. The results of the construction noise modeling have been included in Appendix J of the Draft EIR. The results of the construction noise modeling show that construction activities with the highest potential noise levels would not exceed the applicable five decibel increase threshold of significance established by the City of Glendale's Noise Ordinance and would have a less than significant noise impact. Installation of the proposed water and natural gas pipelines would involve construction activities in closer proximity to sensitive receptors compared to construction at the LFG conditioning and power generation facility. For example, the western end of the proposed natural gas pipeline is located within approximately 200 feet of Lower Scholl Canyon Park. However, the proposed natural gas pipeline is limited to 3-inch diameter pipe that would primarily be installed above ground. As a result, pipeline installation is expected to involve limited support equipment that are not expected to generate substantial noise levels. Construction of the pipelines by nature are conducted in a linear manner and any noise associated with pipeline installation would occur within close proximity to any receptor during construction for a week or less.

Table 41 of the Draft EIR shows the resulting Project operation noise level at each of the six representative sensitive residential receptors. As shown in Table 41, Project operation noise ranges from 29.9 dBA to 40.6 dBA at each sensitive residential receptor. The greatest increase in existing noise levels at any of the six sensitive residential receptors modeled was predicted to be a 2.2 dBA increase during daytime and a 1.5 dBA increase during the nighttime, which are well below the City's allowable increase of 5 dBA in the City noise ordinance used for purposes of the Project's noise impact analysis. It should be noted that the City of Glendale's noise ordinance requires equal or more stringent noise limitations than those established by adjacent municipalities with sensitive receptors that could be affected.

The City of Glendale's Noise Element specifies a 65 dBA exterior noise standard for open space which includes parks where peace and quiet are determined to be of prime importance. The Noise Element additionally specifies that neighborhood parks are normally acceptable in noise environments up to 70 dBA. The Noise Element further lists sports areas/outdoor spectator sports as conditionally acceptable in noise environments up to 75 dBA. Appendix J of the Draft EIR shows the location of the 65 dBA, 70 dBA, and 75 DBA Project operation noise levels. The 65 dBA Project operation noise level would extend approximately 50 feet from the proposed power plant facility. Even when utilizing the conservative 65 dBA recreation land use compatibility threshold, a majority of the active landfill area would remain available for recreation after closure and in consideration of allowable noise levels.

Transportation

The Project would result in a peak of 42 passenger car equivalents per day during construction and six passenger car equivalent trips per day during operation. The long-term operation vehicle trips are comparable to those that already exist for operation of the LFG collection and treatment/conditioning activities and would represent a negligible increase from existing conditions. A majority of pipeline installation would be accomplished within the landfill property with access using Figueroa Street. Any use

of Glenoaks Canyon Road to support installation of approximately ¼ mile of natural gas pipeline located off the landfill property would be limited to several vehicles per day over a week or less. This limited level of vehicle use is not expected to result in traffic-related impacts on Glen Oaks Canyon Road.

The Notice of Preparation (NOP) for the Project was noticed March 21, 2019. At the time of the NOP, Project impacts related to vehicles were measured and analyzed using estimated vehicle trips and levels of service standard. At the time of the NOP, the City of Glendale had not yet adopted VMT as a method of measuring transportation impacts as required by SB 743. The City of Glendale has updated its Transportation Analysis Guidelines to require as of July 1st, 2020, a VMT analysis as part of transportation analysis and environmental review for development projects in the City. The City's updated Transportation Analysis Guidelines specify that projects that generate fewer than 145 daily vehicle trips can be presumed to cause a less-than significant transportation impact and would not require a detailed VMT analysis. As noted, above the Project would generate up to 42 passenger car equivalent trips per day during construction and 6 passenger car equivalent trips per day during operation. Because the Project would result in fewer than 145 daily tips, the Project can be presumed to cause a less-than significant transportation impact and would not require a detailed VMT analysis.

Disaster Routes

The Los Angeles County Operational Area Primary Disaster Routes identified for the City of Glendale are State Route 134, State Route 2, and Interstate 5. The Secondary Disaster Routes in the City of Glendale are Verdugo Road/Canada Boulevard, Foothill Boulevard, Colorado Street, and San Fernando Road (Los Angeles County Department of Public Works, 2012)[80]. Nearby Figueroa Street is also designated as a Secondary Disaster Route for the City of Los Angeles. It is important to note that according to Los Angeles County, disaster routes are not evacuation routes. Although an emergency may warrant a road be used as both a disaster and evacuation route, they are completely different. An evacuation route is used to move the affected population out of an impacted area.

The Project site is located approximately ½ mile from State Route 134 (the nearest Primary Disaster Route) and more than ¾ mile from the Figueroa Street (the nearest Secondary Disaster Route). The Project would not preclude or alter emergency access. As discussed above and within Sections 4.7 and 4.14 of the Draft EIR, the Project incorporates mitigation measures to reduce the potential for hazards, hazardous materials, and wildfire impacts. Mitigation Measures HAZ-1, HAZ-2, HAZ-3, and HAZ-4 would require worker training, equipment inspections, equipment maintenance in designated areas, and stringent fuel storage/refueling practices. Mitigation Measures FIRE-1, FIRE-2, and FIRE-3 would require preparation and implementation of a Fire Protection Plan, prohibition of smoking and open flames, and maintenance of firefighting water supply and tools during construction. The Project would be additionally designed and operated in accordance with applicable fire codes including vegetation clearance and setback requirements. The Project would result in a less than significant substantial increase or

[80] Los Angeles County Department of Public Works, 2012, City of Glendale Disaster Route Map, Available: https://dpw.lacounty.gov/dsg/DisasterRoutes/map/Glendale.pdf

potentially significant risk associated with a fire, explosion, or release of hazardous materials with mitigation incorporated.

Public Safety Related to an Increase in Truck Traffic

As noted in the Draft EIR, the following truck and worker vehicle trips would be associated with the Project:

- five roundtrip truck trips and ten worker vehicle trips daily during the four to five month-demolition phase;
- ten roundtrip truck trips and twelve worker vehicle trips daily during the nine to ten-month site grading and construction period; and
- three roundtrip truck trips and 20 worker vehicle trips daily during the two to three-month system startup phase.

Each truck was assumed to represent three passenger car equivalents and worker vehicles were assumed to represent one passenger car equivalent. There would be no increase in truck traffic during operation of the Project compared to existing conditions. Up to six worker vehicle trips would occur daily during operation, which is equivalent to what occurs under existing facility operations. While there would be an incremental increase in truck traffic during construction of the Project, a peak, short-term addition of the truck and vehicle trips during construction would not substantially increase risks to public safety.

Illegal Dumping

The Project does not include the hauling of waste materials to the Scholl Canyon Landfill from offsite sources that could result in illegal dumping in adjacent residential areas. Please also refer to Topical Response No. 1.

9.2.9 Topical Response No. 9: Wildfires

Summary of Comments

Comments were received that the Project has unacceptable fire hazard risks due to its location and use of flammable materials such as LFG and natural gas. Comments were also received expressing concern over single lane evacuation routes for local residences in the event of a fire.

Responses

Location in Very High Fire Hazard Zone

As noted in Section 4.14 of the Draft EIR, the Project site is located within a very high fire hazard zone. Despite the designation, the site itself has little wildfire potential due to the large areas with little or no native vegetation (fuel). Additionally, per Glendale Fire Prevention regulations, proper vegetation management procedures such as weed abatement and brush clearance programs are required and will

be implemented*. As noted in Newtown Preservation Society v. County of El Dorado, No. C092069 (3rd Dist., June 16, 2021)*, evidence about past wildfires and the risk of future wildfires impacting residents near a proposed project does not require the lead agency to prepare an EIR unless there is substantial evidence supporting a fair argument that the project may exacerbate existing wildfire hazards. Notwithstanding same, this EIR has thoroughly addressed the risks of wildfires and the City's preparedness to respond should the need arise. No substantial evidence of increased wildfire has been presented with respect to the Project.

Fire During Construction

Construction activities would include the operation of construction equipment and vehicles and use of flammable fuels in this equipment that would introduce a source of potential wildland fire. Mitigation Measures HAZ-1, HAZ-2, HAZ-3, and HAZ-4 would require worker training, equipment inspections, equipment maintenance in designated areas, and stringent fuel storage/refueling practices. Mitigation Measures FIRE-1, FIRE-2, and FIRE-3 would require preparation and implementation of a Fire Protection Plan, prohibition of smoking and open flames, and maintenance of firefighting water supply and tools during construction. As described further in Sections 4.7 and 4.14 of the Draft EIR, potential hazards, hazardous materials, and wildfire impacts of the Project would be less than significant with these mitigations.

Landfill Gas Release/Fire

LFG contains many different gases. Methane and carbon dioxide make up 90 to 98 percent of LFG. The remaining 2 to 10 percent includes nitrogen, oxygen, ammonia, sulfides, hydrogen and various other gases. LFG are produced when bacteria break down organic waste. The amount of these gases depends on the type of waste present in the landfill, the age of the landfill, oxygen content, the amount of moisture, and temperature. For example, gas production will increase if the temperature or moisture content increases. Though production of these gases generally reaches a peak in five to seven years, a landfill can continue to produce gases for more than 50 years. Methane is the major component of natural gas. It can be highly flammable and can form explosive mixtures with air if it concentrates in an enclosed space with poor ventilation. The range of air concentrations at which methane levels are considered to be an explosion hazard is 5 to 15 percent of the total air volume. Because the LFG is captured and burned, LFG explosions are uncommon occurrences. See the CDC link which discusses hazards of LFG. https://www.atsdr.cdc.gov/hac/landfill/html/ch3.html. LFG can become dangerous if it migrates into enclosed spaces and mixes with oxygen, and where it is not captured and combusted.

The existing LFG is not readily flammable outside of the conditions described above, consequently it would be highly unlikely that its release could or would result in spontaneous combustion. LFG is already currently burned in flares at Scholl Canyon Landfill under a permit from the SCAQMD; the Project involves burning that LFG and capturing the energy from that burn to generate electricity. The existing LFG treatment occurs under low gas line pressure and similarly, the Project would involve low gas pressures. For example, the Project would involve gas pressures below the 15 pounds per square inch gauge pressure the State of California uses for requiring specific safety design and labeling requirements for gases stored and handled at higher pressures. For comparison, the International Football Association

Board requires soccer balls to have a pressure between 8.5 and 14.7 pounds per square inch gauge (IFAB, 2017). Based on the low gas pressures associated with the Project and decommissioning of the 5.5-mile-long LFG pipeline to Grayson Power Plant that represents an existing fire risk, the Project's fire hazard would be similar to or lower than existing conditions.

The engines that would combust LFG for power generation are an additional source of potential fire. The most probable source of fire would be a lube oil fire. The electrical generating combustion engines would be placed in fire protection enclosures with fire suppression systems and electrical equipment would be placed in enclosures insulated with an inert gas. Because the engines would be contained in steel enclosures equipped with fire suppression systems, they would not represent a substantial risk of fire. The existing flares would remain and do not represent a new source of potential wildland fire.

Additionally, the proposed facilities include a fire protection system that consists of a new 60,000-gallon water tank, water conveyance piping, two fire hydrants, and fire protection sprinklers inside buildings. The proposed fire protection system is designed to meet National Fire Protection Agency and California Fire Code requirements. The City of Glendale Fire Department, as the Certified Unified Program Agency has reviewed and approved the Project's fire protection design which includes verifying compliance with all applicable national, state, and local fire codes. As a result of these fire protection measures, potential operation phase impacts from a fire, and as discussed in Section 4.14 of the Draft EIR, were determined to be less than significant.

In the unlikely event that piping or equipment containing LFG fails due to internal corrosion or external force, because pressures are less than 15 pounds per square inch gauge, the danger of a serious explosion is virtually non-existent (which is why the state does not require specific design and labeling of equipment containing materials at such low pressure). As previously mentioned, the LFG is not readily flammable as discussed above, so a release would be unlikely to result in spontaneous combustion. Additionally, as noted already, the engines are contained in steel enclosures equipped with fire suppression systems.

Evacuation Routes

As described above, the Project would have less than significant hazards and wildfire impacts with mitigation incorporated. The Project does not include a component that would alter the design, capacity, or degrade a public roadway. As summarized in Section 4.11 of the Draft EIR vehicle and truck trips associated with Project construction would not significantly reduce the level of service of any potentially affected public roadway. Project operation would involve a similar number of vehicle trips compared to those which occur in support of the existing LFG collection and flaring activities. Consequently, the Project would not result in an increase in vehicle and truck trips that would have the potential to significantly reduce the existing level of service on any public roadway or evacuation route.

Wildfire Mitigation Plan

Pursuant with Senate Bill 90, passed in September 2018, the City of Glendale maintains and reviews, amends, and adopts a City-wide Wildfire Mitigation Plan annually. The Wildfire Mitigation Plan focusses

on limiting likelihood of ignition of fires from assets and equipment and limiting local spread of fires to prevent wildfires (City of Glendale, 2021).

Fire Stations and Mutual Aid Agreements

Glendale Fire Department Station 23 is located approximately 1.45 miles north of the Project site. There is also a Los Angeles Fire Department station located approximately 1.4 miles south of the Project site. The City of Glendale has mutual aid agreements for fire response with surrounding municipalities including the Cities of Los Angeles and Pasadena. This mutual aid agreement would apply to a fire at the Project site.

9.2.10 Topical Response No. 10: Project Alternatives

Summary of Comments

Comments were received that the Draft EIR inadequately analyzed Project Alternatives.

Responses

Background – CEQA Requirements for Selection of Alternatives

CEQA requires that a Lead Agency describe a range of reasonable alternatives for evaluation, which would feasibly attain most of the basic project objectives but would avoid or substantially lessen any of the significant effects of the project. CEQA Guidelines Section 15126.6(a). The nature and scope of the alternatives studied in an EIR is governed by a rule of reason. CEQA Guidelines Section 15126.6(f). An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. CEQA Guidelines Section 15126.6(a). The EIR should briefly describe the rationale for selecting the alternatives to be discussed. CEQA Guidelines Section 15126.6(c).

There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. *Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553; Laurel Heights Improvement Association v. Regents of the University of California (1988) 47 Cal.3d 376*. Because the primary purpose of an EIR is to mitigate or avoid significant environmental effects, the alternatives discussion is focused on alternatives to the project that are capable of avoiding or substantially lessening any significant effects of the project, even if those alternatives would impede to some degree the attainment of the project objectives or would be more costly. CEQA Guidelines Section 15126.6(b).

Of the alternatives that fit the above criteria, the EIR need examine in detail only those alternatives that the Lead Agency determines could feasibly attain most of the basic objectives of the project. CEQA Guidelines Section 15126.6(f). An EIR need not present alternatives that are incompatible with the project's fundamental purpose. *Bay-Delta Programmatic Envt'l Impact Report Coordinated Proceedings (2008) 43 Cal.4th 1143, 1164; Bay Area Citizens v. City of Oceanside (2004) 119 Cal.App.4th 477; Jones v. Regents of Univ. of Cal. (2010) 183 Cal.App.4th 818.*

No set number of alternatives is necessary to constitute a legally adequate range of alternatives. The scope will vary from case to case depending on the nature of the project and the Lead Agency has discretion to determine how many alternatives constitute a reasonable range. *Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 566.*

Further, neither CEQA nor the CEQA Guidelines require that an EIR include studies comparing the project's environmental costs with its benefits. See *San Francisco Ecology Ctr. v City & County of San Francisco* (1975) 48 CA3d 584, 595. The only direct comparison required in an EIR is the comparison of project alternatives, and a cost-benefit analysis is not required in making that comparison. 14 Cal Code Regs §15126.6(d).

The Draft EIR complies with CEQA Requirements Regarding Selection of Alternatives

Section 5.0 of the Draft EIR evaluates a reasonable range of Project alternatives. In addition to the No Project Alternative (Alternative 1), the Draft EIR evaluates the following three Project alternatives: Convert the LFG to Natural Gas (Alternative 2), Convert LFG to Liquid Natural Gas (Alternative 3), and Locate Engine Generators at an Another Location (Alternative 4). As described in Section 2.1 of the Draft EIR, other than the No Project Alternative, Alternatives 2 through 4 were selected because each could feasibly attain some of the Project objectives. Because the Project does not result in unmitigated significant impacts, the Draft EIR instead focuses on Project alternatives that could potentially reduce environmental impacts as compared to the Project, while still attaining the Project objectives. Additionally, the alternatives selected reflect the types of projects that are either being used to manage LFG now at existing landfills in California on a LFG production scale similar to the Scholl Canyon Landfill or are being reasonably considered for such use.

While three Project alternatives were selected for detailed analysis, in addition to the No Project Alternative, several other Project alternatives were also considered, but not selected for detailed analysis. The rational for screening the alternatives not selected for further investigation is below:

Generate Electricity in Microturbines. As noted in Section 5.4.1 of the Draft EIR, there is not an existing or planned LFG project in California that generates electricity using microturbines on the scale needed to beneficially use the Scholl Canyon Landfill LFG. While microturbines are technically feasible, to accommodate the LFG, this alternative would need 70 microturbines to handle the LFG that would substantially increase the size of the operation and maintenance activities compared to the proposed Project that utilizes four internal combustion engines. This alternative would result in grading and development of an additional ½ acre of previously undisturbed areas adjacent to the active landfill compared to the proposed Project, therefore this alternative would result in an increase in impacts to aesthetics, biological resources, cultural resources, and land use from an increase in development of previously undisturbed land adjacent to the active landfill compared to the proposed Project. This alternative would substantially increase operation and maintenance activities associated with the number of microturbines necessary to process the LFG. Therefore, this alternative was not considered for further analysis.

Generate Electricity in Combustion Turbines. Gas turbines require high pressure inlet gas, and the installation of high-pressure gas compressors would reduce the proposed Project's electrical output and entail higher capital cost due to the increase in gas compression equipment and energy use required to compress the LFG compared to that required for RICEs associated with the proposed Project. The potential environmental impacts of gas turbines would be comparable to the Project's internal combustion engines, but implementation of this alternative would not only increase operational and maintenance costs, but it would not prevent otherwise potentially significant impacts from occurring compared to the proposed Project, therefore this alternative was not considered for further analysis.

Reduce the Number of Internal Combustion Engines from Four to Three. The potential environmental impacts of removing one gas engine and flaring excess gas would be comparable to the proposed Project, however this alternative would not avoid any potentially significant environmental impacts. Further, this alternative would not beneficially use the LFG to the same degree as the proposed Project and would not meet the Project objectives as well as the Project, therefore, this alternative was not considered for further analysis.

Generate Electricity with Fuel Cells. The largest obstacles to generating electricity from fuel cells with LFG are the high cost and energy requirement of the LFG cleanup system and unreliability of existing technology to effectively remove siloxanes, silicones, sulfur, VOC's and other unwanted constituents from the LFG. LFG cleanup system technology has not developed sufficiently to promote operations of fuel cells on LFG at the scale needed to consume the available LFG at the Scholl Canyon Landfill. This alternative would achieve the proposed Project objectives but to a lesser degree because of the impacts associated with the scale needed to consume the LFG, it is not technically or economically feasible at the scale required and therefore was not considered for further analysis.

Convert LFG to Compressed Natural Gas. This alternative would not substantially decrease any of the Project's environmental impacts. This Alternative would have lower operation phase emissions of air pollutants, greenhouse gases, and noise compared to combustion of the LFG in internal combustion engines to generate electricity. However, the air quality impacts from vehicle emissions and noise associated with hundreds of truck-fueling trips per day would likely result in comparable operational emissions and noise as the proposed Project. The construction disturbance size and duration of this alternative would result in greater, emissions, noise, and traffic during construction compared to the proposed Project. Additionally, more grading of previously undisturbed areas and removal of native vegetation would result because of the additional access needed to accommodate vehicle fueling; therefore, this alternative would have a greater potential impact to biological resources, geology and soils, and hydrology and water quality; particularly during construction. The additional site size and grading required would have also have a greater potential for aesthetics and land use impacts. There would be an increase in energy use due to the compression of the natural gas and traffic during operation of this alternative related to vehicles fueling at the CNG fueling station whether located at Scholl Canyon Landfill or Grayson Power Plant. The handling and storage of CNG represents a greater consequence in the event of an accidental release compared to the aqueous ammonia storage associated with the proposed Project for emissions control.

Further, potential construction air quality, greenhouse gas emissions, biological resources, geology and soils, hydrology and water quality, noise, and traffic and transportation impacts would be greater than those of the proposed Project. Potential operation phase aesthetics, hazards and hazardous materials, land use and planning, traffic and transportation noise, energy, and wildfire impacts would be greater than those of the proposed Project. While this alternative meets the proposed Project objective of beneficial reuse of the LFG, it would not generate electricity and will not assist the City in meeting the Renewable Portfolio Standard requirements. Consequently, converting the LFG to CNG for use as vehicle fuel was not considered further as an alternative due to substantially greater potential environmental impacts and not meeting the objectives as well as the proposed Project.

In summary, the Draft EIR considered various technology alternatives to capture, incinerate, and put the naturally occurring LFG produced by the waste decomposition process at Scholl Canyon Landfill to beneficial use. As explained in Section 5.4 of the Draft EIR, because of the increased environmental impacts, technological feasibility, appropriate fit on the site, among other factors, the Lead Agency chose a reasonable range of three feasible alternatives and the No Project for further evaluation.

Environmentally Superior Alternative

The CEQA Guidelines state that if the No Project Alternative is the environmentally superior alternative, the EIR must also identify “an environmentally superior alternative” from among the other alternatives. CEQA Guidelines Section 15126.6(e)(2). When none of the alternatives is clearly environmentally superior, it is sufficient for the EIR to explain the environmental advantages and disadvantages of each alternative.

The Draft EIR discussion of the comparative environmental impacts of the Project alternatives complies with the requirements of CEQA. The Draft EIR includes a detailed description of the potential environmental impacts of each Project alternative as compared to the proposed Project in Sections 5.6.1 through 5.6.4. In addition, Table 55 describes the environmental advantages and disadvantages of each alternative. Furthermore, the Draft EIR at Section 5.6.6 includes the required level of evaluation of the relative impacts of each Project alternative, and concludes that the Alternative 2 is the Environmentally Superior Alternative because it would reduce more proposed Project impacts when compared to the other alternatives. These include reductions in impacts to aesthetics, air quality, noise, greenhouse gas emissions and wildfire risk. Alternative 2 impacts on biological resources are similar to the proposed Project. Alternative 2 decreases more impacts compared to the proposed Project, also when compared to the other alternatives.

L1 - Responses to Comments from Bret Marnell, received July 9, 2020

L1-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L1-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L1-3 Please refer to Topical Response No. 2.

L1-4 The City consulted with solar developers and evaluated the potential for solar arrays atop the landfill after closure. The site was determined unfeasible for solar arrays as a result of potential landfill settling which would be inconsistent with required stability for the structural foundations for the arrays. As discussed in the EIR, the renewable electricity generation equipment associated with the Project would not be located on land with underlying landfill waste materials. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Response No. 10.

L1-5 Please refer to Topical Response No. 7. LFG is already being flared at Scholl Canyon Landfill pursuant to an existing SCAQMD permit.

L2 - Responses to Comments from Carolyn Howard-Johnson, received July 9, 2020

L2-1 The comment is a general statement expressing the commenter's support of the Project. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L3 - Responses to Comments from Dan Petroff, received July 9, 2020

L3-1 Please refer to Section 5.4, Alternatives Considered and Not Selected for Further Analysis, of the Draft EIR for the discussion of the Project alternative of generating electricity in combustion turbines (Section 5.4.2). The Project involves combusting LFG in

reciprocating internal combustion engines to produce renewable electricity. Please also refer to Topical Response No. 10.

L4 - Responses to Comments from Jake Katz, received July 9, 2020

L4-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 1, 5, and 7.

L5 - Responses to Comments from Ken Grayson, received July 9, 2020

L5-1 The cost of the project is a budgetary and policy issue, not a CEQA issue. Under Pub Res C §§21100 and 21151, which require an EIR for projects that "may have a significant effect on the environment," the phrase "significant effect on the environment" is limited to substantial, or potentially substantial, adverse changes in physical conditions within the area as defined in Pub Res C §21060.5. In §21060.5, "environment" is defined as the physical conditions which exist within the area which will be affected by a proposed Project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. See also 14 Cal Code Regs §15360. As a result of this statutory mandate, effects that are subject to review under CEQA must be related to a change to the physical environment. 14 Cal Code Regs §15358(b). Only changes to the physical environment will trigger the need for an EIR; social or economic impacts alone will not do so because they are not changes in physical conditions. This principle is reflected in 14 Cal Code Regs §§15064(e) and 15382, which provide that economic and social changes may not be treated as significant effects on the environment. It is also reflected in Pub Res C §21080(e) and 14 Cal Code Regs §15064(f)(6), which provide that evidence of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment is not substantial evidence of a significant effect on the environment. See also Pub Res C §21082.2(c). Please also refer to Topical Response No. 10.

L6 - Responses to Comments from Romeo Balina, received July 9, 2020

L6-1 Please refer to Response L5-1.

L7 - Responses to Comments from Roberto Melendez, received July 31, 2020

L7-1 Please refer to Response L1-4. Please also refer to the Project Description in the EIR and to Section 5.0, Alternatives, of the Draft EIR for the analysis of project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the project objectives, reduce project impacts is some areas, and will assist in informed decision-making. The objective of the proposed

Project is to safely capture all the existing and future LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill to destroy the methane and use it for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Response No. 10.

L8 - Responses to Comments from Bill Markis, received August 1, 2020

L8-1 The Project evaluated in the Draft EIR is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft EIR. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L9 - Responses to Comments from Nancy and Dan Wall, received August 5, 2020

L9-1 Please refer to Topical Responses No. 1, 5, and 7.

L10 - Responses to Comments from Fred Wallingford, received August 9, 2020

L10-1 Please refer to Topical Response No. 5.

L10-2 Please refer to Topical Response No. 2.

L10-3 The comment is a general statement about the commenter's concerns for (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L11 - Responses to Comments from Jay Jen Mimi Sam and Ozzie Duplass, received August 10, 2020

L11-1 Please refer to Topical Responses No. 1, 5, and 7.

L12 - Responses to Comments from Kit Cole, received August 12, 2020

L12-1 The comment is a general statement expressing the commenter's support of the Project. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L13 - Responses to Comments from Ken Salter, received August 18, 2020

L13-1 The comment is a general statement about the commenter's concerns for (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's

statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L13-2 Please refer to Topical Responses No. 1, 5, and 7.

L13-3 Please refer to Topical Response No. 5.

L13-4 Please refer to Topical Responses No. 1, 5, and 7.

L14 - Responses to Comments from Mona Valeriano, received August 19, 2020

L14-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 5, 6, 8, and 9.

L14-2 Please refer to Topical Responses No. 6 and 9.

L14-3 The Project evaluated in the Draft EIR is the Biogas Renewable Generation Project. The comment refers to operation of the landfill which is not within the scope of the Project evaluated in the Draft EIR. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L14-4 Please refer to Topical Response No. 5.

L14-5 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Responses No. 2 and 10.

L14-6 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L14-7 Please refer to Topical Response No. 1.

L15 - Responses to Comments from WM Johnson, received August 19, 2020

L15-1 The Project evaluated in the Draft EIR is the Biogas Renewable Generation Project. The comment refers to air conditioning, utility write-offs, and housing development which are not within the scope of the Project evaluated in the Draft EIR. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L16 - Responses to Comments from Elisa Foster, received August 22, 2020

L16-1 Please refer to Topical Response No. 5.

L16-2 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. The objective of the proposed Project is to safely capture and incinerate all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Response No. 10.

L17 - Responses to Comments from Stephanie Chan, received August 22, 2020

L17-1 The Project evaluated in the Draft EIR is the Biogas Renewable Generation Project. The comment refers to "retrofitting a dirty fossil fuel plant" which is not the project that is the subject of this EIR, or within the scope of the Project evaluated in the Draft EIR. The comment therefore does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L17-2 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Response No. 10.

L18 - Responses to Comments from County of Los Angeles Fire Department, received August 25, 2020

L18-1 The comment is with regard to the Planning Division of the County of Los Angeles Fire Department. The comment states that the subject property is entirely within the City of Glendale and does not appear to have any impact on the emergency responsibilities of the County of Los Angeles Fire Department.

L18-2 The comment is with regard to the Land Development Unit of the County of Los Angeles Fire Department. The comment states that the subject property is entirely within the City of Glendale and is unlikely to have an impact that necessitates a comment concerning general requirements from this Unit.

L18-3 The comment is with regard to the Forestry Division of the County of Los Angeles Fire Department. The comment states that responsibilities of this Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archaeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas are addressed in Sections 4.3.4, 4.5.4, 4.8.4, 4.12.4, and 4.14.4 of the Draft EIR. The Final Initial Study/ Mitigated Negative Declaration (IS/MND) for the Biogas Renewable Generation Project concluded that the proposed Project would not result in potentially significant and unavoidable environmental impacts related to cultural resources, and therefore, additional analysis concerning cultural resources was not carried forward to the Draft EIR.

While not considered a sensitive community for the purposes of CEQA, coast live oak and scrub oak are protected under the City of Glendale's "Indigenous Tree Ordinance." Depending on the diameter at breast height of the impacted trees a permit and replacement trees may be required. The City of Glendale would be required to seek a permit for impacts to protected trees to comply with the "Indigenous Tree Ordinance." Please refer to Section 4.3 of the Draft EIR for additional analysis and information regarding biological resources.

L18-4 The comment is with regard to the Health Hazardous Materials Division of the County of Los Angeles Fire Department. The comment states that the subject property is entirely within the City of Glendale and the County of Los Angeles Fire Department has no jurisdiction in the City of Glendale.

L19 - Responses to Comments from Joe Valeriano, received August 29, 2020

L19-1 The comment conflates the Project which is the subject of this EIR with an expansion of the Scholl Canyon Landfill, which is not part of the Project; The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.

L20 - Responses to Comments from Susan Hunt, received August 30, 2020

L20-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L20-2 Please refer to Topical Response No. 9.

L20-3 Please refer to Topical Response No. 5.

L20-4 Please refer to Topical Response No. 6.

L20-5 Please refer to Topical Response No. 8.

L20-6 The commenter requests consideration of Alternative 2, converting LFG to natural gas. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis and consideration of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. The objective of the proposed Project is to safely capture and incinerate all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Section 5.6.5 of the Draft EIR includes a comparison of the Project with alternatives evaluated. Please also refer to Topical Response No. 10. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L21 - Responses to Comments from Amy G Koss, received August 31, 2020

L21-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L21-2 This comment is a general statement about current environmental conditions in Glendale. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 5 for additional discussion of air quality.

L21-3 This comment is a general statement about current environmental conditions in Glendale. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L21-4 This comment is a general statement about current environmental conditions in Glendale. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 9 for additional discussion of fire hazards.

L21-5 This comment is a general statement about current environmental conditions in Glendale. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 6 and 9.

L21-6 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis and consideration of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Response No. 10.

L22 - Responses to Comments from Janise and Eduardo Escobar, received August 31, 2020

L22-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L22-2 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than continuing to flare the LFG, the proposed Project seeks to beneficially use the LFG for power generation utility at the Scholl Canyon Landfill to assist the City in meeting and

exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation.

L22-3 Please refer to Topical Responses No. 7 and 9.

L22-4 Please refer to Topical Response No. 5.

L22-5 Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significant cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Responses No. 1, 4, 5, 6, 8, and 9.

L22-6 Please refer to Topical Response No. 8.

L22-7 Methane gas is a naturally occurring byproduct of landfills and will continue to be generated for many years, well after landfill closure as waste materials continue to decompose. The Project objective is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Response No. 1.

L22-8 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis and consideration of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Responses No. 5, 7, and 10.

L23 - Responses to Comments from Janise and Eduardo Escobar, received August 31, 2020

L23 This is a duplicate comment letter received separately from the original submission. Please see responses to comments to L22 from Janise and Eduardo Escobar, received August 31, 2020.

L24 - Responses to Comments from Philip Lee, received August 31, 2020

L24-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L24-2 Please refer to Topical Response No. 5.

L24-3 Please refer to Topical Response No. 8.

L25 - Responses to Comments from Stephanie Schus Russin, received August 31, 2020

L25-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L25-2 Please refer to Topical Responses No. 4, 5, 8, and 9.

L25-3 Please refer to Topical Response No. 5.

L25-4 Flares are proposed to be replaced by Los Angeles County Sanitation District. The City of Glendale is not the Lead Agency for the flare replacement project. This comment has been forwarded to Los Angeles County Sanitation District.

L25-5 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L26 - Responses to Comments from Becky Newman, received September 1, 2020

L26-1 Please refer to Topical Response No. 9.

L26-2 Please refer to Topical Response No. 1.

L26-3 The commenter expresses general concerns over potential environmental impacts of the Project. Please refer to Section 4.0, Environmental Impact Analysis, of the Draft EIR for an analysis of potential environmental impacts of the Project. Please also refer to Topical Responses No. 1, 4, 5, 6, 8, and 9.

L26-4 The commenter requests additional consideration of alternatives, primarily Alternative 2, converting LFG to natural gas. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis and consideration of project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the project objectives, reduce project impacts is some areas, and will assist in informed decision-making. Please also refer Section 5.4 of the Draft EIR for a discussion of why individual project alternatives were not selected for further analysis. Please also refer to Topical Responses No. 2 and 10.

L26-5 Please refer to Topical Response No. 2.

L26-6 The Project is a use permitted by the City of Glendale General Plan and Zoning Ordinance. The Scholl Canyon Landfill is currently operating with a Conditional Use Permit. Please also refer to Topical Responses No. 1 and 4.

L26-7 Please refer to Topical Responses No. 1 and 4.

L26-8 Please refer to Topical Response No. 5.

L26-9 Please refer to Topical Response No. 6.

L26-10 Please refer to Topical Response No. 9.

L26-11 Please refer to Topical Responses No. 1, 4, and 5. Please also refer to Section 4.2, Air Quality, of the Draft EIR for emission summaries during Project construction and operation and Section 5.4, Alternatives Considered and Not Selected for Further Analysis, of the Draft EIR for a discussion of why individual project alternatives were not selected for further analysis. Please also refer to Topical Response No. 10.

L26-12 Please refer to Topical Response No. 4. See Project Description in the Draft EIR. The “engines” are not forty feet tall.

L26-13 Please refer to Table 24 of Section 4.3, Biological Resources, of the Draft EIR for a list of Known and Potential Occurrence of Special-Status Wildlife within the Biological Study Area. When evaluating the threshold of “Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites?”, the impact analysis determined that although species would be disrupted during certain activities, impacts to wildlife movement and migratory corridors from the proposed Project would not be significant. Please refer to Section 4.3 of the Draft EIR for additional information regarding biological resources.

L26-14 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the project objectives, reduce project impacts is some areas, and will assist in informed decision-making. The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Response No. 10.

L26-15 Please refer to Topical Response No. 5 for updated greenhouse gas emissions estimates of the Project. These estimates reflect an assumed increase in the available volume of LFG. The LFG would either be combusted in flares or the reciprocating internal combustion engines. The Project’s potential greenhouse gas emissions impacts are

based on the combustion of all the available LFG. All LFG combusted by the reciprocating internal combustion engines would be LFG no longer combusted in flares under exiting conditions. The Project's potential increase in greenhouse gas emissions and determination of potential climate change impacts is accurate in charactering the change from baseline to proposed conditions. As shown in Topical Response No. 5, the Project's potential climate change impacts would be less than significant regardless if LFG was assumed to be combusted in the flares at Scholl Canyon Landfill or boilers at Grayson Power Plant as baseline conditions for the EIR.

L26-16 Please refer to Topical Responses No. 6, 7, and 9.

L26-17 Please refer to Section 4.5, Geology and Soils, Section 4.7, Hazards and Hazardous Materials, and Section 4.8, Hydrology and Water Quality of the Draft EIR for information regarding the Stormwater Pollution Prevention Plan (SWPPP), which includes best management practices (BMPs) to regulate stormwater runoff, prevent soil erosion, and address material handling and hazardous material management, as required by the Construction General Permit. BMPs identified in the proposed Project SWPPP will be implemented during Project construction to minimize the risk of an accidental release of hazardous materials and to provide the necessary information for emergency response should it be needed.

Please also refer to the Mitigation Measures *HAZ-1* through *HAZ-4*, discussed in Section 4.7 of the Draft EIR for information regarding hazardous containment procedures.

L26-18 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.

L26-19 Please refer to Topical Response No. 8.

L26-20 Please refer to Topical Response No. 8.

L26-21 The additional detailed information requested by the commenter would not change the analysis of Project environmental impacts in the Draft EIR and is not required by CEQA. For information regarding the natural gas pipeline please refer to Section 2.3, Description of the Proposed Project of the Draft EIR.

L26-22 Please refer to Response L26-4.

L27 - Responses to Comments from Department of Resources Recycling and Recovery (CalRecycle), received September 1, 2020

L27-1 This comment introduces an attached comment letter submitted on behalf of CalRecycle.

L27-2 The comment summarizes the Project Description and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L27-3 The comment requests that addressed comments are reflected throughout the Final EIR. If revisions are necessary, they will be made in the Final EIR.

L27-4 The word "Exiting" was misspelled and should be "Existing". This will be corrected in the errata to the Final EIR prior to certification.

L27-5 The instances identified of the references to Appendix H should be references to Appendix J, Noise Modeling and Data Collection Sheets. This reference will be corrected in the errata to the Final EIR prior to certification.

L27-6 If the Project is approved, following approval and prior to the start of operation, the proposed Project will be adequately described in the Joint Technical Document (JTD) for the Scholl Canyon Landfill. Per Title 27, California Code of Regulations (27 CCR), Section 21620, the operator will submit proposed changes in design or operation to the Local Enforcement Agency (LEA) for review and approval at least 180 days prior to implementation.

L27-7 CalRecycle will receive copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed Project.

L27-8 CalRecycle will receive notice of any public hearing and/or decision regarding the Project a minimum of 10 days in advance.

L27-9 If there are any questions regarding the submitted comments the provided email address will be contacted.

L28 - Responses to Comments from Larry and Laurel Haltum, received September 1, 2020

L28-1 Please refer to Topical Responses No. 6 and 9.

L28-2 Please refer to Topical Responses No. 5, 6, and 7.

L28-3 Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significant cancer risks, to non-cancer acute risks, or to non-cancer chronic risks. Please also refer to Topical Response No. 5.

L28-4 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L29 - Responses to Comments from Marie-Ange Vuillemin, received September 1, 2020

L29-1 The comment is a general statement about the commenter's opinions about Glendale's air quality and does not make specific reference to the Biogas Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L30 - Responses to Comments from Randy Glass, received September 1, 2020

L30-1 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than continuing to flare all the LFG, the proposed Project seeks to beneficially use the LFG for renewable electricity generation utility at the Scholl Canyon Landfill to assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation. Please refer to Section 4 of the Draft EIR for a discussion of the Project's potential environmental impacts.

L30-2 Please refer to Topical Response No. 5.

L30-3 Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significant cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Response No. 5

L31 - Responses to Comments from Gina Esposito, received September 2, 2020

L31-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significant cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Response No. 5.

L31-2 The commenter expresses general concerns over potential environmental impacts of the Project and states that they are not sufficiently discussed in the Draft EIR. Please refer to Topical Responses No. 1 through 10 for additional discussion regarding the Project's

potential environmental impacts. The Project does not involve a “business”. The Project is owned and will be operated by the City of Glendale.

L31-3 There is no “big business” involved in the construction, operation, or maintenance of the proposed Biogas Renewable Generation Project. It will be owned and operated by the City of Glendale. The commenter expresses concern over the location of the proposed Project stating that it is too close to residences. Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than continuing to flare all the LFG, the proposed Project seeks to beneficially use the LFG for renewable electricity generation utility at the Scholl Canyon Landfill to assist the City in meeting and exceeding State requirements for renewable energy generation. Scholl Canyon Landfill will continue to produce LFG for many years to come and that LFG is required to be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation. Please refer to Section 4 of the Draft EIR for a discussion of the Project’s potential environmental impacts

L31-4 Please refer to Topical Response No. 9.

L31-5 Please refer to Topical Responses No. 1, 5, 7, and 9.

L31-6 The comment expresses opposition to the expansion of the Scholl Power Plant. There is no existing Scholl Power Plant, accordingly it is not possible to expand something that does not exist. See the Project Description in the Draft EIR. The comment is a general statement about the commenter’s opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter’s statement is included in the Final EIR for the decision-maker’s consideration as part of the City’s deliberations on the Project.

L32 - Responses to Comments from Christine Holland, received September 3, 2020

L32-1 The comment is a general statement about the commenter’s opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter’s statement is included in the Final EIR for the decision-maker’s consideration as part of the City’s deliberations on the Project.

L32-2 The comment is a general statement about the commenter’s opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter’s statement is included in the Final EIR for the decision-maker’s consideration as part of

the City's deliberations on the Project. Please also refer to Topical Responses No. 5, 6, and 9.

L32-3 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L32-4 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L33 - Responses to Comments from Elizabeth Park, received September 3, 2020

L33-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 1, 5, and 7.

L34 - Responses to Comments from Jaime Borenstein, received September 3, 2020

L34-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L34-2 Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significant cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Response No. 5.

L34-3 Please refer to Topical Response No. 9.

L34-4 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than

continuing to flare the LFG, the proposed Project seeks to beneficially use the LFG for renewable electricity generation utility at the Scholl Canyon Landfill to assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation. Please refer to Section 4 of the Draft EIR for a discussion of the Project's potential environmental impacts. Please also refer to Topical Response No. 6.

L34-5 Please refer to Section 4.5, Geology and Soils, Section 4.7, Hazards and Hazardous Materials, and Section 4.8, Hydrology and Water Quality of the Draft EIR for information regarding the Stormwater Pollution Prevention Plan (SWPPP), which includes best management practices (BMPs) to regulate stormwater runoff, prevent soil erosion, and address material handling and hazardous material management, as required by the Construction General Permit. BMPs identified in the proposed Project SWPPP will be implemented during Project construction to minimize the risk of an accidental release of hazardous materials and to provide the necessary information for emergency response.

Please also refer to Topical Response No. 7 and the Mitigation Measures *HAZ-1* through *HAZ-4*, discussed in Section 4.7 of the Draft EIR for information regarding hazardous containment procedures.

L34-6 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the project objectives, reduce project impacts is some areas, and will assist in informed decision-making. Please also refer to Topical Response No. 10.

L35 - Responses to Comments from Karen King, received September 3, 2020

L35-1 These comments (L35-1 through L35-6) were originally submitted by Jaime Bornstein, received September 3, 2020. Please refer to responses to comments to L34.

L36 - Responses to Comments from Karen King, received September 3, 2020

This is a duplicate comment letter received separately from the original submission. Please see responses to comments to L35 from Karen King, received September 3, 2020.

L37 - Responses to Comments from Gregg and Summer Wiele, received September 4, 2020

L37-1 Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significant cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Response No. 5.

L37-2 Please refer to Topical Responses No. 1, 2, and 7.

L37-3 Please refer to Topical Responses No. 7 and 9.

L37-4 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than continuing to flare all of the LFG, the proposed Project seeks to beneficially use the LFG for renewable electricity generation utility at the Scholl Canyon Landfill to assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation. Please refer to Section 4 of the Draft EIR for a discussion of the Project's potential environmental impacts. Please also refer to Topical Response No. 7.

L38 - Responses to Comments from Gregg, Summer, and Brooklyn Wiele, received September 4, 2020

L38-1 This is a duplicate comment letter received separately from the original submission. Please see responses to comments to L37 from Gregg and Summer Wiele received September 4, 2020.

L39 - Responses to Comments from Donielle Lemone, received September 5, 2020

L39-1 Please refer to Topical Responses No. 1 and 9.

L39-2 Please refer to Topical Response No. 2.

L40 - Responses to Comments from Marwan and Amy Ataya, received September 6, 2020

L40-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L40-2 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. Scholl Canyon Landfill

naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than continuing to flare all of the LFG, the proposed Project seeks to beneficially use the LFG for renewable electricity generation utility at the Scholl Canyon Landfill to assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation. Please refer to Section 4 of the Draft EIR for a discussion of the Project's potential environmental impacts. Please also refer to Topical Response No. 7.

L40-3 Please refer to Topical Response No. 9.

L40-4 Please refer to Topical Response No. 5.

L40-5 Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significant cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Response No. 5.

L40-6 Please refer to Topical Response No. 8.

L40-7 Please refer to Topical Response No. 6.

L40-8 Please refer to Topical Response No. 4.

L40-9 Please refer to Topical Responses No. 1, 2, and 7.

L41 - Responses to Comments from Priscila Kasha, received September 6, 2020

L41-1 The commenter introduces themself and identifies her relationship to Glendale. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L41-2 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L41-3 Please refer to Topical Response No. 1.

L41-4 to L41-10 These comments were originally received from Becky Newman on September 1, 2020. Please refer to responses to comments to L26.

L41-11 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than continuing to flare all of the LFG, the proposed Project seeks to beneficially use the LFG for renewable electricity generation utility at the Scholl Canyon Landfill to assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation. Please refer to Section 4 of the Draft EIR for a discussion of the Project's potential environmental impacts. Please also refer to Topical Response No. 7.

L41-12 to L41-14 These comments were originally received from Becky Newman on September 1, 2020. Please refer to responses to comments to L26.

L41-15 Please refer to Topical Response No. 9.

L41-16 Please refer to Topical Response No. 7.

L41-17 to L41-26 These comments were originally received from Becky Newman on September 1, 2020. Please refer to responses to comments to L26.

L41-27 The additional detailed information requested by the commenter would not change the analysis of Project environmental impacts in the Draft EIR and is not required by CEQA. For information regarding the natural gas pipeline please refer to Section 2.3, Description of the Proposed Project, of the Draft EIR. No transmission lines will be constructed for the proposed Project. Existing transmission lines will be utilized to connect the electric generating equipment to the local grid.

L41-28 This comment was originally received from Becky Newman on September 1, 2020. Please refer to Response L26.

L41-29 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 10.

L42 - Responses to Comments from Wyndham Chow, received September 6, 2020

L42-1 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Response No. 10.

L43 - Responses to Comments from Emily Koss, received September 7, 2020

L43-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 7 and 9.

L44 - Responses to Comments from Marguerita Drew, received September 7, 2020

L44-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L44-2 Please refer to Topical Responses No. 5 through 9.

L44-3 Please refer to Topical Responses No. 7 and 9.

L44-4 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L44-5 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L44-6 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's

statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L45 - Responses to Comments from Aida Galusian, received September 8, 2020

L45 These comments (L45-1 through L45-8) were originally submitted by Marwan and Amy Ataya, received September 6, 2020. Please refer to Response L40.

L46 - Responses to Comments from Orbel Minassian, received September 8, 2020

L46 These comments (L46-1 through L46-8) were originally submitted by Marwan and Amy Ataya, received September 6, 2020. Please refer to Response L40.

L47 - Responses to Comments from Sharice B. Marootian, received September 8, 2020

L47-1 Please refer to Topical Responses No. 1, 5, 7, and 9.

L48 - Responses to Comments from Talin Minassian, received September 8, 2020

L48 These comments (L48-1 through L48-8) were originally submitted by Marwan and Amy Ataya, received September 6, 2020. Please refer to ResponseL40.

L49 - Responses to Comments from Teni Shahnazarian, received September 8, 2020

L49 These comments (L49-1 through L49-8) were originally submitted by Marwan and Amy Ataya, received September 6, 2020. Please refer to Response L40.

L50 - Responses to Comments from Erika Kraetsch, received September 9, 2020

L50-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L50-2 to
L50-6 These comments were originally submitted by Jaime Borenstein, received September 3, 2020. Please refer to Response L34.

L51 - Responses to Comments from Kate DiRienzo-Payne, received September 9, 2020

L51-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L51-2 Please refer to Topical Response No. 1.

L51-3 Based on the results of the health risk assessment, shown in Tables 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significance cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Responses No. 1, 5, 7, and 9.

L51-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L52 - Responses to Comments from Angela Cohen, received September 10, 2020

L52-1 Please refer to Topical Responses No. 4, 5, and 8.

L52-2 Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significance cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Responses No. 1, 5, and 7.

L52-3 Please refer to Topical Response No. 4.

L53 - Responses to Comments from Allen St. John, received September 10, 2020

L53-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L54 - Responses to Comments from Ann Reed, received September 10, 2020

L54-1 Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significance cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Responses No. 5 and 7.

L55 - Responses to Comments from Brian Newlin, received September 10, 2020

L55-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's

statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L55-2 Please refer to Topical Response No. 5.

L55-3 Please refer to Topical Response No. 7.

L55-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L56 - Responses to Comments from Elan Borenstein, received September 10, 2020

L56-1 The commenter discusses the dangers of methane gas and the dangers of releasing methane gas into the atmosphere. Methane gas is a naturally occurring byproduct of active and inactive landfills. The Draft EIR discusses methane gas and the rules and regulations regarding its capture and control in Section 2.0, Project Description, Section 4.2, Air Quality, and Section 4.6, Greenhouse Gas Emissions. The Project objective is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity.

L56-2 Please refer to Topical Response No. 9.

L56-3 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the Project objectives, reduce Project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Please also refer to Topical Response No. 10.

L57 - Responses to Comments from Gary and Cheryl Hannah, received September 10, 2020

L57-1 Please refer to Topical Responses No. 4 and 8.

L57-2 Please refer to Topical Responses No. 5 and 7.

L58 - Responses to Comments from Isabella Meyer, received September 10, 2020

L58-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's

statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L58-2 Please refer to Topical Response No. 9.

L58-3 Please refer to Topical Responses No. 6 and 7. Please also refer to the Mitigation Measures *HAZ-1* through *HAZ-4*, discussed in Section 4.7 of the Draft EIR for information regarding hazardous containment procedures.

L58-4 Methane gas is a naturally occurring byproduct of active and inactive landfills. The Draft EIR discusses methane gas and the rules and regulations regarding its capture and control in Section 2.0, Project Description, Section 4.2, Air Quality, and Section 4.6, Greenhouse Gas Emissions. The Project objective is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Response No. 1.

L58-5 Please refer to Topical Responses No. 5 and 8.

L58-6 Please refer to Topical Response No. 4.

L59 - Responses to Comments from Jamie Kellum, received September 10, 2020

L59-1-5 The comments (L59-1 through L59-5) were originally submitted by Marwan and Amy Ataya, received September 6, 2020. Please refer to responses to comments to L40.

L59-6 The commenter's statement expresses support for Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the project objectives, reduce project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Please also refer to Topical Response No. 10.

L60 - Responses to Comments from John and Caroline Weiner, received September 10, 2020

L60-1 Please refer to Topical Responses No. 5, 6, and 9.

L60-2 Please refer to Topical Responses No. 5 and 8.

L60-3 Please refer to Topical Response No. 8.

L60-4 Please refer to Section 4.3, Biological Resources, of the Draft EIR for an analysis of biological impacts of the Project and associated mitigation measures that will be implemented to reduce impacts.

L60-5 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L61 - Responses to Comments from Larry Moorehouse, received September 10, 2020

L61-1 The comment is a general statement about the commenter's opinion and involvement in previous landfill activities not proposed as part of the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L61-2 The Project does not propose combustion of LFG in diesel engine generators.

L61-3 The power generation facility would operate on a fulltime basis but would not require full time on-site staffing. City staff would not always be present on the Project site because the power generation facility would be remotely monitored through a Supervisory Control and Data Acquisition (SCADA) system. The SCADA system includes software and hardware elements that would allow the equipment to be monitored and controlled from the remote locations. The proposed power generation facility would be remotely monitored using monitoring centers in Brea, California and Bristol, Pennsylvania. An alarm would be triggered at the power generation facility and remote monitoring locations in the event of an upset operating condition. The City's on-call staff would then be immediately notified and called-out for operation and maintenance support. Extensive hands-on training would be provided to City operators who will also have access to the monitoring system. If needed, in an emergency, the engines can be completely shut off manually or via remote access.

L61-4 The Project does not propose combustion of LFG in diesel engine generators.

L61-5 The permits and approvals anticipated to be required for the Project are described in Section 1.4 of the Draft EIR. The City will be required to obtained all of the permits and approvals anticipated to be required for Project implementation.

L61-6 All waste generated from Project implementation would be handled in accordance with applicable federal, state, and local regulatory requirements.

L61-7 The engines will be inside enclosures. See Draft EIR Section 2.3.1 (Power Generation Facility) of the Project Description. An overhead crane is not proposed or necessary for routine engine maintenance.

L61-8 The City will maintain the engines with support from contracted specialists as needed.

L61-9 As described in the Final EIR, LFG may be combusted in the existing or future replaced flares while all four of the proposed engines are operating. Please refer to Topical Response No. 5.

L61-10 As described in Section 2.3.2 of the Draft EIR, the proposed engines would operate on a 90 percent LFG or greater fuel ratio.

L61-11 As described in Section 2.3.3 of the Draft EIR, the existing LFG pipeline from Scholl Canyon Landfill to Grayson Power Plant would be purged with an inert gas such as nitrogen and capped with cement plugs.

L61-12 The City will be responsible for handling the SCAQMD regulatory requirements for the reciprocating internal combustion engines used to generate renewable electricity with support from contracted specialists as needed.

L62 - Responses to Comments from Max and Lucilla Denuna, received September 10, 2020

L62-1 Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significance cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Response No. 5.

L62-2 Please refer to Topical Responses No. 5 and 8.

L62-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L63 - Responses to Comments from Valerie D., received September 10, 2020

L63-1 Please refer to Topical Responses No. 6, 7, and 9.

L63-2 Please refer to the Mitigation Measures *HAZ-1* through *HAZ-4*, discussed in Section 4.7 of the Draft EIR for information regarding hazardous containment procedures.

L63-3 Please refer to Topical Response No. 5.

L63-4 Please refer to Section 5.0, Alternatives, of the Draft EIR and Topical Response No. 2.

L63-5 Please refer to Topical Response No. 1.

L63-6 Please refer to Topical Response No. 1.

L64 - Responses to Comments from Shackeh Mastian, received September 11, 2020

L64-1 Please refer to Section 4.2, Air Quality, of the Draft EIR for the Toxic Air Contaminant emissions from the reciprocating internal combustion engines during Project operations.

L65 - Responses to Comments from Bethsaida (Betsy) Castillo-Cifuentes, received September 14, 2020

L65-1 The commenter introduces herself and identifies her relationship to Glendale. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L65-2 The commenter directly reiterates comments submitted by Priscila Kasha on September 6, 2020. Please refer to responses to comments of L41 from Priscila Kasha, received September 6, 2020. Please also refer to Topical Response No. 10.

L66 - Responses to Comments from Claudia Sysock, received September 14, 2020

L66-1 Please refer to Topical Responses No. 7 and 9.

L66-2 Please refer to Topical Response No. 5.

L67 - Responses to Comments from E. Nevins, received September 14, 2020

L67 The comments (L67-1 through L67-3) reiterate comments originally submitted by Marwan and Amy Ataya, received September 6, 2020. Please refer to Response L40.

L67-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L68 - Responses to Comments from Ferrari, received September 14, 2020

L68-1 The comments (L68-1 through L68-3) reiterate comments originally submitted by Marwan and Amy Ataya, received September 6, 2020. Please refer to Response L40.

L69 - Responses to Comments from Flora Corin, received September 14, 2020

L69-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's

statement regarding property value impacts of the Project is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L69-2 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. However, the Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than continuing to flare all the LFG, the proposed Project seeks to beneficially use the LFG for power generation utility at the Scholl Canyon Landfill to assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation. Please refer to Section 4 of the Draft EIR for a discussion of the Project's potential environmental impacts.

L69-3 Please refer to Topical Response No. 6.

L69-4 Methane gas is a naturally occurring byproduct of active and inactive landfills. The Project objective is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Response No. 7.

L70 - Responses to Comments from Frances F. Coburn, received September 14, 2020

L70-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L70-2 Please refer to Topical Response No. 5.

L70-3 Please refer to Topical Response No. 5.

L70-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L71 - Responses to Comments from Monica Lago-Kaytis, received September 14, 2020

L71-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L71-2 to L71-6 The comments (L71-2 through L71-6) reiterate comments previously submitted by Marwan and Amy Ataya on September 6, 2020. Please refer to responses to comments of L40 from Marwan and Amy Ataya, received September 6, 2020.

L71-7 Please refer to Topical Responses No. 1, 2, and 10. The Project is a use permitted by the City of Glendale General Plan and Zoning Ordinance. The commenter requests consideration of Alternative 2, converting LFG to natural gas. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis and consideration of project alternatives required for an EIR under the CEQA Guidelines.

L72 - Responses to Comments from Omar Mauricio Cifuentes, received September 14, 2020

L72-1 The commenter introduces himself and identifies his relationship to Glenoaks Canyon. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L72-2 to L72-29 The remaining comments within this letter (L72-2 through 29) directly reiterate comments previously submitted by Priscila Kasha on September 6, 2020. Please refer to Response L41 from Priscila Kasha, received September 6, 2020. Please also refer to Topical Response No. 10.

L73 - Responses to Comments from Dora Herrera, received September 16, 2020

L73-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L73-2 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis and consideration of project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the project objectives, reduce project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated

by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate power. Please also refer to Topical Responses No. 1, 2, and 10.

L74 - Responses to Comments from Nancy Wise, received September 16, 2020

L74-1 The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate power.

L74-2 Please refer to Topical Responses No. 1, 2, and 7.

L74-3 Please refer to Topical Response No. 2.

L74-4 Please refer to Topical Responses No. 2 and 4.

L74-5 Please refer to Topical Response No. 1.

L74-6 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L74-7 The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity. Please also refer to Topical Response No. 2.

L75 - Responses to Comments from Rafael Hernandez, received September 16, 2020

L75-1 to L75-8 The comments within this letter (L75-1 through 8) directly reiterate comments previously submitted by Marwan and Amy Ataya on September 6, 2020. Please refer to responses to comments of L40 from Marwan and Amy Ataya, received September 6, 2020.

L75-9 The commenter's statement expresses support for Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the Project objectives, reduce Project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Please also refer to Topical Response No. 10.

L76 - Responses to Comments from Randall Wise, received September 16, 2020

L76 The comments within this letter (L76-1 through L76-7) directly reiterate comments previously submitted by Nancy Wise on September 16, 2020. Please refer to responses to comments to L74 from Nancy Wise, received September 16, 2020.

L77 - Responses to Comments from Richard Espinosa, received September 16, 2020

L77-1 The commenter's statement expresses support for Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the project objectives, reduce project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Please also refer to Topical Response No. 10.

L78 - Responses to Comments from Shirley Woo, received September 16, 2020

L78-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 1, 2, and 7.

L78-2 to L78-4 The comments (L78-2 through L78-4) reiterate comments previously submitted by Marwan and Amy Ataya on September 6, 2020. Please refer to responses to comments of L40 from Marwan and Amy Ataya, received September 6, 2020.

L78-5 The commenter's statement expresses support for Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the project objectives, reduce project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Please also refer to Topical Response No. 10.

L79 - Responses to Comments from Cindy Swensen, received September 17, 2020

L79 The comments within this letter (L79-1 through L79-7) reiterate comments previously submitted by Marwan and Amy Ataya on September 6, 2020. Please refer to responses to comments of L40 from Marwan and Amy Ataya, received September 6, 2020.

L80 - Responses to Comments from Michael Mallory, received September 19, 2020

L80-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 1, 2, and 7.

L80-2 Please refer to Topical Responses No. 6, 7, and 9.

L80-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L80-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L80-5 Please refer to Topical Responses No. 1, 2, and 7.

L81 - Responses to Comments from Richard Schmittdiel, received September 21, 2020

L81-1 The comment is a general statement expressing the commenter's support of the Project. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L81-2 The comment is a general statement expressing the commenter's support of the Project. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L81-3 The comment is a general statement expressing the commenter's support of the Project. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L82 - Responses to Comments from Joan Morris, received September 22, 2020

RESPONSE TO COMMENTS

L82-1 The comment introduces the comments in the letter. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L82-2 Please refer to Topical Response No. 4.

L82-3 Please refer to Topical Responses No. 1, 2, and 10. The Project is a use permitted by the City of Glendale General Plan and Zoning Ordinance. The comment is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the Project objectives, reduce Project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill.

L82-4 Please refer to Topical Response No. 1.

L82-5 Please refer to Topical Responses No. 1 and 4.

L82-6 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the Project objectives, reduce Project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Please also refer to Topical Response No. 10.

L82-7 Please refer to Topical Response No. 4.

L82-8 Please refer to Topical Response No. 4.

L82-9 Please refer to Topical Response No. 8.

L82-10 Please refer to Topical Response No. 4.

L82-11 Please refer to Topical Responses No. 1 and 4.

L82-12 The additional detailed information requested by the commenter would not change the analysis of Project environmental impacts in the Draft EIR and is not required by CEQA. Please also refer to Topical Responses No. 1 and 4.

L82-13 Please refer to Topical Responses No. 1 and 4.

L82-14 Please refer to Topical Response No. 7. The Draft EIR evaluates the baseline conditions at the time the Notice of Preparation was published. Because it is not known with exactitude when the landfill will close best estimates have been given based on the best available data at this time. After the Scholl Canyon Landfill closes (and that may occur in phases as with prior portions of the land fill), it is unknown how long the property transfer from the County of Los Angeles to the City of Glendale will take; it is also unknown what type of recreational improvements will be made and where the future recreational/open space development will occur and when such development will be approved and implemented. Accordingly, assessing future unknown conditions is at best speculative, and CEQA does not require speculation.

L82-15 Please refer to Topical Response No. 9.

L82-16 Please refer to Topical Responses No. 1, 2, and 5.

L82-17 The commenter's statement expresses support for Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 2, 6, 7, and 8.

L82-18 The commenter's statement expresses support for Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L83 - Responses to Comments from Amaly Avakian, received September 23, 2020

L83-1 to L83-8 The comments within this letter (L83-1 through L83-8) directly reiterate comments previously submitted by Marwan and Amy Ataya on September 6, 2020. Please refer to responses to comments of L40 from Marwan and Amy Ataya, received September 6, 2020.

L83-9 The commenter's statement expresses support for Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L84 - Responses to Comments from Coalition for Scholl Landfill Alternatives (CSLA), received September 23, 2020

L84-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L84-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or

CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L84-3 Please refer to Topical Response No. 9.

L84-4 Please refer to Topical Response No. 5.

L84-5 Please refer to Topical Response No. 6.

L84-6 Please refer to Topical Response No. 2.

L84-7 Please refer to Topical Response No. 1.

L84-8 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L85 - Responses to Comments from Renee Holt, received September 23, 2020

L85-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 5.

L85-2 Please refer to Topical Responses No. 7 and 9.

L85-3 Please refer to Topical Response No. 6.

L85-4 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. However, the Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than continuing to flare all the LFG, the proposed Project seeks to beneficially use the LFG for power generation utility at the Scholl Canyon Landfill to assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation.

L85-5 The commenter discusses the dangers of methane gas and the dangers of releasing methane gas into the atmosphere. Methane gas is a naturally occurring byproduct of

active and inactive landfills. The Draft EIR discusses methane gas and the rules and regulations regarding its capture and control in Section 2.0, Project Description, Section 4.2, Air Quality, and Section 4.6, Greenhouse Gas Emissions. The Project objective is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate renewable electricity.

The commenter's statement expresses support for Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the Project objectives, reduce Project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Please also refer to Topical Response No. 10.

L86 - Responses to Comments from Sharon McDonald, received September 23, 2020

L86-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L86-2 Please refer to Topical Response No. 9.

L86-3 The commenter's statement expresses support for Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L86-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L86-5 Please refer to Topical Responses No. 5, 6, 8, and 9.

L86-6 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L87 - Responses to Comments from Alice Ryu, received September 24, 2020

L87-1 Please refer to Topical Responses No. 1, 5, and 7.

L87-2 The EIR's analysis of potential environmental impacts is not solely limited to the geographic borders of the City of Glendale. For example, Sections 4.1 (Aesthetics), 4.10 (Noise), 4.11 (Transportation) discuss potential environmental impacts outside the City of Glendale. The Project's potential air quality (Section 4.2) and greenhouse gas emissions (Section 4.6) impacts are additionally analyzed on a regional and global scale.

L87-3 Comments from Los Angeles City Council District 14 were submitted on September 25, 2020 and are included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Response L95.

L88 - Responses to Comments from Joan Morris, received September 24, 2020

L88-1 This is a duplicate comment letter received separately from the original submission. Please see responses to comments to L82 from Joan Morris, received September 22, 2020.

L89 - Responses to Comments from Linda Goodman Pillsbury, received September 24, 2020

L89-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L89-2 Please refer to Topical Response No. 9.

L89-3 Please refer to Topical Response No. 5.

L89-4 Please refer to Topical Response No. 6.

L89-5 Please refer to Topical Responses No. 1, 5, and 8.

L89-6 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.

L89-7 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's

statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L89-8 The commenter's statement expresses support for Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the Project objectives, reduce Project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Please also refer to Topical Response No. 10.

L90 - Responses to Comments from Randall and Rowena Abarro, received September 24, 2020

L90-1 to L90-8 The comments within this letter (L90-1 through L90-8) directly reiterate comments previously submitted by Marwan and Amy Ataya on September 6, 2020. Please refer to responses to comments of L40 from Marwan and Amy Ataya, received September 6, 2020.

L90-9 The commenter's statement expresses support for Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L91 - Responses to Comments from Sylvia Denlinger, received September 24, 2020

L91-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L91-2 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the Project objectives, reduce Project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Please also refer to Topical Response No. 10.

L91-3 The Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from

the SCAQMD. Rather than continuing to flare all the LFG, the proposed Project seeks to beneficially use the LFG for power generation utility at the Scholl Canyon Landfill to assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation. Please also refer to Topical Response No. 5.

L92 - Responses to Comments from Virginia L Melin, received September 24, 2020

L92-1 Section 15126.6(d) of the State CEQA Guidelines states that alternatives analysis need not be presented in the same level of detail as the assessment of the proposed Project. Rather, the EIR is required to provide sufficient information to allow for meaningful evaluation, analysis, and comparison with the proposed Project. If an alternative would cause one or more significant impacts in addition to those of the proposed Project, analysis of those impacts is to be discussed, but in less detail than for the proposed Project. Please also refer to Topical Response No. 10.

L93 - Responses to Comments from Bill Fritz, received September 25, 2020

L93-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L93-2 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. However, the Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than continuing to flare all of the LFG, the proposed Project seeks to beneficially use the LFG for power generation utility at the Scholl Canyon Landfill to assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation.

Please also refer to Topical Responses No. 7 and 9.

L93-3 Please refer to Topical Response No. 6.

L93-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's

statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L94 - Responses to Comments from City of Los Angeles Sanitation & Environment (LASAN), received September 25, 2020

L94-1 If there are any questions regarding the submitted comments the provided phone number will be contacted.

L94-2 The comment introduces the order of comments presented in the letter and is intended to be informative in nature.

L94-3 The comment provides a background of the proposed Project and associated environmental documents and decisions. It is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L94-4 The health risk assessment was prepared in accordance with the Office of Environmental Health Hazard Assessment (OEHHA) Guideline and SCAQMD Risk Assessment Procedures for Rule 1401, 1401.1 and 212. As described in the submitted HRA protocol to AQMD (Appendix B.3.1 of Draft EIR), the receptor grid covers an approximate area of 36 square kilometers with 50 meters spacing between receptors. The receptor grid includes the Eagle Rock residents near the southern boundary property of the landfill. The health risk assessment results, as discussed in the Draft EIR, are below the significance threshold for any receptors outside the landfill property boundary. Receptors located further away from the Project site and outside the receptor grid considered in the Draft EIR would be exposed to even lower potential health risks than receptors inside the receptor grid.

L94-5 Please refer to Topical Response No. 5 for dioxin and furan emissions.

L94-6 Hexavalent chromium, arsenic, and nickel emissions were included in the City of Glendale, Glendale Water and Power AB2588 Report dated July 2018. Toxic pollutant emissions were calculated using SCAQMD reference value toxic air contaminants (TAC) emission factors for LFG combusted in the boilers. Reference values may reflect data from multiple landfills with different gas characteristics and serve as a conservative assessment of worst-case emissions and these compounds were not detected in laboratory analyses of gas produced at Scholl Canyon Landfill. TAC emissions from the internal combustion engines and flares may differ from those of boilers due to different combustion technologies. Based upon practice and SCAQMD emission factor reference data for LFG when combusted in engines, hexavalent chromium, arsenic, and nickel emissions are not expected from LFG combustion in engines. The 2010 LFG analysis and the AB2588 Hot Spots risk assessment for the Grayson Power Plant boilers that operated on LFG does not show hexavalent chromium, arsenic, and nickel. Additionally, the Project includes an advanced fuel conditioning and siloxane removal systems that are designed to remove impurities, including solid materials, from the LFG.

L94-7 The health risk assessment was conducted based on 100 percent LFG operated at the proposed equipment. TAC emissions from the LFG combustion were calculated based on the lab analytical results from Scholl Canyon gas samples, USEPA AP-42, CARB California Air Toxics Emission Factor clearing house report on formaldehyde, and dioxin/furan lab data from boiler exhaust collected at Grayson Power Plant. Please also refer to Topical Response No. 5.

L94-8 The commenter concludes that the City is improperly relying on the GMC exemption for utility projects because there is "no division of subdivision of land…"; however, this conclusion is incorrect. Title 16, section 16.08.010 entitled Primary Ridgeline – Preservation", applies to more than tract maps or parcel maps, it also applies to "…*building plans, and grading plans* for *any property* with primary ridgelines within its boundaries shall include provisions for the complete preservation of such primary ridgeline areas in their natural state." (Emphasis added). (GMC §16.08.010 (B) entitled "Applicability" included below in its entirety). The applicability of the Primary Ridgeline Preservation provisions to grading and building plans as well as tract and parcel maps fulfills the purpose of primary ridgeline preservation otherwise primary ridgelines could be impacted by grading or building activities not associated with a tract or parcel map. Moreover, Title 30 (Zoning), Section 30.15.040.E, which sets for the development standards for the SR zone states:

"E Regulations in Major Ridgeline Areas, Secondary Ridgeline Areas, and Blue-Line Stream Areas. All subdivisions, development, building, construction, and grading in the SR Zone shall be regulated by Sections 16.04.030, 16.04.003, and 16.04.037 of this code as related to major ridgeline areas, secondary ridgeline areas, and blue-line stream areas. Any exception to the standards contained in these sections shall only be made by the planning commission/city council at a public hearing."

For purposes of clarification and amplification, the entire GMC Section 16.08.010 governing primary ridgeline preservation reads as follows (with emphasis added):

"**16.08.010 Primary ridgeline areas—Preservation.**

A. Intent and Purpose. Primary ridgelines are the highest undeveloped and visually dominant ridgelines in a viewshed, recognized by the continuous horizon line formed against the sky. The primary ridgelines are an exhaustible and precious scenic resource of the city and its citizens worthy of preservation for the welfare of all the citizens of Glendale. As the hillsides of Glendale continue to be developed, proper planning is necessary to protect primary ridgelines from grading activities.

B. *Applicability. Tentative tract and parcel maps,* ***building plans, and grading plans*** *for any property with primary ridgelines within its boundaries shall include provisions for the complete preservation of such primary ridgeline areas in their natural state.*

C. Primary Ridgelines Area Defined. A primary ridgeline area shall be any ridgeline in the city so designated as “primary ridges”1 on Sheet Nos. OC, OD, 1C, 1D, 2C, 3C, 4A, 4B, 4C, 4D, 5B, 5C, 5D, 6B, 6C, 6D, 6E, 6F, 7B, 7C, 7D, 7E, 7F, 8B, 8C, 8D, BE, 8F, 8G, 9D, 9E, 9F, 9G, 10E, 10F and 10G of the Glendale, Los Angeles County, California, metropolitan area two hundred (200) scale topographic maps which are attached to the ordinance codified in this title, incorporated herein and by this reference made a part hereof.

D. Prohibitions. No grading, engineered slopes, housing construction, streets, utilities or other manmade features shall be permitted within identified primary ridgeline areas.

E. Exceptions. It is recognized that from time to time, it may be necessary for improved public street access or fire protection vehicle access to be taken across identified primary ridges to promote the public health, safety and general welfare, to ensure adequate traffic circulation, and to provide appropriate ingress and egress for emergencies. In such cases, the city council/planning commission may declare a need for a public street crossing a primary ridge, and all grading and improvement plans for such public street, including necessary accessory engineered slopes and utility extensions underneath the street, or fire road shall be subject to the approval of the city council/planning commission. Such declaration of need shall be made at a duly noticed and conducted public hearing and the city council/planning commission shall make supportive written findings that each of the following exists:

1. The location of the public street or fire road is proper in relation to adjacent uses, the development of the community and to the various elements and objectives of the general plan.

2. The public street or fire road will not be materially detrimental to the character of the neighborhood nor will it endanger the public health, safety and general welfare.

3. It has been demonstrated that the public street or fire road will improve and enhance traffic circulation in a manner advantageous to the public convenience and welfare, or that the fire road will improve hillside fire protection access to an area.

4. The establishment of the proposed public street or fire road will not impede the normal and orderly development and improvement of surrounding property for permitted uses.

5. The appearance of the proposed public street or fire road will not be so at variance with the appearance of adjoining ridgeline areas as to cause substantial depreciation of ridgeline appearance in the vicinity.

6. Adequate drainage devices, landscaping and other necessary appurtenances will be provided to city standards.

7. Alternative designs for street access have been evaluated and examined and have been determined to be infeasible.

F. Clustering of Development into Nonprohibited Areas. Where protection of environmental resources pursuant to subsection D of this section necessitates preserving portions of a parcel in an undeveloped state, the city shall permit a density transfer for those dwelling units that otherwise would be allowable pursuant to Chapter 30.11 of this code onto less sensitive portions of the parcel.

G. *Utilities. Nothing in this section shall prohibit the maintenance, upgrading or improvement of existing public or quasi-public utilities which traverse identified primary ridges.*

H. Transmission Facilities. Radio wave transmission facilities which have obtained a conditional use permit under the provisions of Title 30 of this code shall be permitted within primary ridgeline areas.

I. Corrective Work. Nothing in this section shall prohibit the city council/planning commission from authorizing grading deemed necessary to correct existing natural hazardous conditions that are brought to the city's attention.

J. The determination that any specific property or portion thereof falls within the area described by subsection C of this section may be appealed pursuant to the city's uniform appeal procedure, Chapter 2.88 of this code. (Ord. 5683 § 2, 2009)."

Additionally, the commenter claims that exemption from the Primary Ridgeline Preservation protections "are distinct from the infrastructure required of the Project as issue." Section 16.08.010 (G) entitled "Utilities", states that "*Nothing in this section shall prohibit the maintenance, upgrading or improvement of existing public or quasi-public utilities which traverse identified primary ridges."*

GMC §15.04.010 (Title 15 entitled "Buildings and Construction"), defines Public Utility. A "Public utility means and includes, for the purposes of this chapter, the public service department of the city, fire and police divisions of the city as to fire and police signal systems, and any person owning, operating or maintaining overhead light, power, trolley, telephone, telegraph signal or other wires, street railway tracks or underground pipes, conduits or structures necessary for public service."

Further, GMC § 30.70.220, the definitions section of Title 30 (entitled "Zoning"), defines utility and transmission facilities as "…facilities for the production, storage, transmission, distribution, and recovery of water, sewage, energy, and other similar utilities."

Here, the Scholl Canyon Landfill and its supporting infrastructure are a necessary public service (collection and disposition of waste from the wasteshed). As part of its function, Scholl Canyon Landfill is required to collect and incinerate the naturally occurring LFG

(e.g., biogas) by-product of waste decomposition. LFG is collected through existing underground pipes which are connected to an on-site SCAQMD flaring system is part of the City's public utility system. The Project's purpose is to capture and incinerate the LFG and capture the energy by-product from such incineration for beneficial public use. The Project is a public utility project and by definition is eligible for the Primary Ridgeline Preservation exemption.

L94-9 Please refer to Topical Response No. 4 and see Response immediately above L94-8.

L94-10 The Commenter believes the City may not issue a Conditional Use Permit (CUP) for the Project but must rezone the site. The Commenter is incorrect. The Project is a conditionally permitted use in the Special Recreation zone. Specifically, sanitary landfills and related materials recovery operations, and utility and transmission facilities are conditionally permitted uses in the SR zone. Further, GMC § 30.70.220, defines utility and transmission facilities as "…facilities for the production, storage, transmission, distribution, and recovery of water, sewage, energy, and other similar utilities."

To amplify and clarify this fact, relevant portions of GMC Title 30 are included below, with emphasis. See specifically Table 30.15-A below:

"Chapter 30.15 SPECIAL PURPOSE DISTRICTS
30.15.010 Purpose.

D. SR (Special Recreation) Zone. The SR zone is intended as a zone for public and private open space and recreational uses and is intended to provide and protect open space, natural physical features and scenic resources in accordance with the comprehensive general plan of the city. Individual review of all uses and development is provided due to the unique and special characteristics of the variety of recreational uses possible in order to foster compatibility between uses and to protect the public health, safety and general welfare of the community. (Ord. 5807 § 2, 2013; Ord. 5399 Attach. A, 2004)

30.15.020 Special purpose district land uses and permit requirements.

A. Permitted Primary Uses and Structures. No building, structure or land shall be used and no building, structure or use in the special purpose zoning districts shall be erected, structurally altered, enlarged or established except the following permitted uses, buildings and structures identified with a "P" in Table 30.15-A.

B. Conditional Uses and Structures. The following uses and structures identified with a "C" in Table 30.15-A may be permitted in the special purpose zoning districts subject to approval of a conditional use permit (Chapter 30.42). The development standards of this zone shall apply except as otherwise provided herein.

C. Administrative Uses and Structures. The following uses and structures identified with an "A" in Table 30.15-A may be permitted in the special purpose zoning districts

subject to approval of an administrative use permit (Chapter 30.49). The development standards of this zone shall apply except as otherwise provided herein.

D. Temporary Uses. Temporary uses (identified with a "T" in Table 30.15-A), allowed subject to approval and compliance with all applicable provisions of this Zoning Code.

E. Permitted Accessory Uses and Structures. Accessory uses, buildings and structures shall be permitted in zones identified with a "P" in Table 30.15-A.

F. Wireless Telecommunications Facilities. Wireless telecommunications facilities, identified with a "W" in Table 30.15-A may be permitted subject to the approval of a wireless telecommunications facility permit as set forth in Chapter 30.48 of this code.

G. Standards for Specific Uses. Where the last column in the following tables ("See Standards in Section or Chapter") includes a section number, the regulations in the referenced section apply to the use; however, provisions in other sections of this Zoning Code may apply as well.

H. Uses Not Listed. In the CE and CEM zones only, land uses that are not listed on Table 30.15-A or are not shown in a particular zoning district are not allowed, except where other uses which the director of community development determines to be similar in nature, function and operation to listed permitted primary uses within these zones.

Table 30.15-A

SPECIAL PURPOSE DISTRICTS AND PERMIT REQUIREMENTS

LAND USE (1)(2)	PERMIT REQUIREMENT BY ZONE				See Standards in Section or Chapter
	CE	CEM	MS	SR	
Accessory Buildings, Structures and Uses					
Accessory dwelling unit (ADU), and/or junior accessory dwelling unit (JADU) on a lot developed with one residential dwelling unit			P		30.34.080
Accessory dwelling unit(s) (ADU), on a lot developed with more than one residential dwelling unit			P		30.34.080
Accessory use	P	P	P	P	
Accessory living quarters or guest house not to			P		

LAND USE (1)(2)	PERMIT REQUIREMENT BY ZONE				See Standards in Section or Chapter
	CE	CEM	MS	SR	
exceed an aggregate area of 500 sq. ft. of floor area					
Antennas (pole type) and flagpoles	P	P	P	P	
Auditoriums		P	P		
Caretaker's residences	P	P	P	P	
Carts (freestanding, nonmotorized, portable type)			P	P	30.34.040
Dish antennas	P		P	P	30.32.050
Home occupations			P		
Home-sharing			P		5.110
Manufacturing of containers for caskets, remains and flowers		P			
Mobile medical trailers, temporary			T(5)		
Museums		P			
Nurseries and garden supplies		P			
Reverse vending machines			P		30.12.040
Signs	P	P	P	P	30.33
Solar energy equipment	P	P	P	P	30.30.050

Agriculture, Open Space, and Resources					
Apiaries				P	
Open space/conservation areas				P	
Education, Public Assembly, Recreation—General					
Amphitheaters				P	
Aquariums				P	

LAND USE (1)(2)	PERMIT REQUIREMENT BY ZONE				See Standards in Section or Chapter
	CE	CEM	MS	SR	
Arboretums and botanical gardens				P	
Auditoriums				P	
Aviaries				P	
Bandstands				P	
Community gardens			P	P	
Golf courses, country clubs, driving ranges and related facilities				P	
Libraries				P	
Local fairs				P	
Museums				P	
Observatories				P	
Parks and playgrounds, private			P	P	
Places of worship			P	P(4)	
Public dances				P	
Recreational camps				P	
Riding academies or stables				P(3)	
Stables, including boarding of horses, sale or exchange of horses and horse rentals	P				
Swimming pools				P	
Education, Public Assembly, Recreation Within a Public Park					
Amphitheaters				P	
Aquariums				P	
Arboretums and botanical gardens				P	
Auditoriums				P	

LAND USE (1)(2)	PERMIT REQUIREMENT BY ZONE				See Standards in Section or Chapter
	CE	CEM	MS	SR	
Aviaries				P	
Bandstands				P	
Community center				P	
Community gardens				P	30.34.045
Convention centers				P	
Day care				A	
Golf courses, country clubs, driving ranges and related facilities				P	
Gymnasiums				P	
Libraries				P	
Local fairs				P	
Museums				P	
Observatories				P	
Parks and playgrounds, public				P	
Public dances				P	
Recreational camps				P	
Riding academies or stables				P(3)	
Swimming pools				P	
Institutional Uses					
Cultural arts centers			P		
Hospitals			P		
Museums			P		
Schools, physical instruction			C		
Schools, private			C		

LAND USE (1)(2)	PERMIT REQUIREMENT BY ZONE				See Standards in Section or Chapter
	CE	CEM	MS	SR	
Schools, private specialized education and training			C		
Light Industrial Uses					
Broadcasting studios and indoor support facilities—Productions			P		
Medical and dental laboratories			P		
Miscellaneous Uses					
Non-emergency heliport			P		
Parking lots			P		
Parking structures, subject to PS overlay required setback standards			P		30.23, 30.32.110
Office Uses					
Contractor's office and/or storage, temporary	T		T	T	
Contractor's office			P		
Medical and dental offices			P		
Office			P		
Office, consumer services			P		
Recreational Uses					
Children indoor play areas			P		
Cyber-café establishments			P		
Gyms and health clubs			P		
Indoor recreation center			P		
Private clubs and lodges			P		
Residential Uses					
Domestic violence shelter			P		
Emergency shelter			P		

LAND USE (1)(2)	PERMIT REQUIREMENT BY ZONE				See Standards in Section or Chapter
	CE	CEM	MS	SR	
Multiple residential dwelling units subject to provisions of the R-2250 zone			P		
One residential dwelling per lot subject to provisions of the R-2250 zone			P		
Residential congregate care living, limited			P		
Residential congregate care living, medical			P		
Residential congregate care living, non-medical			P		
Senior housing			P		
Retail Uses					
Alcoholic beverage sales			A	A	
Christmas tree sales lots, when maintained between November 1st and January 9th	T		T		5.44
Jewelry stores			P		
Liquor stores			C		
Pharmacy	P		P		
Pumpkin sales lots, when maintained between October 15th and November 1st	T		T		5.44
Restaurant, counter service with limited seating			P		
Restaurants, fast food			P		
Restaurants, full service			P		
Retail stores, general merchandise			P		

LAND USE (1)(2)	PERMIT REQUIREMENT BY ZONE				See Standards in Section or Chapter
	CE	CEM	MS	SR	
Western retail and supply stores	P				
Service Uses					
Ambulance services			P		
Banks and financial institutions			P		
Business support services			P		
Cemeteries		P			
Day care centers			P		
Gas station			P		
Hotels and motels			P		
Kennel and animal boarding	P			C	
Massage establishment			C		5.64
Mortuaries and funeral homes			P		
Personal services			P		
Repair and maintenance, consumer products			P		
Sanitary landfills and related recovery of materials	-	-	-	***C***	-
Transportation and Communications Uses					
Utility and transmission facilities	***C***	***C***	***C(6)***	***C***	
Wireless telecommunication facilities	W	W	W	W	30.48

Key to Permit Requirements	Symbol	See Chapter
Permitted use	P	

Key to Permit Requirements	Symbol	See Chapter
Administrative use—Administrative use permit required	A	30.49
Conditional use—Conditional use permit required	C	30.42
Temporary use	T	
Wireless telecommunications facilities permit required	W	30.48
Use not allowed		

Notes:

(1) See Section 30.03.010 regarding uses not listed.

(2) See Chapter 30.70 for definitions of the land uses.

(3) Not to be located nearer than 1/2 mile to the R1, R1R, ROS, R-3050, R-2250, R-1650 and R-1250 zones on which there is no H overlay zone.

(4) Places of worship in the SR zone must have been in existence as of September 26, 2006.

(5) Temporary mobile medical trailers must be used on a hospital site and are limited to a period of 2 years.

(6) See Section 30.15.060 for additional standards.

30.15.030 Special purpose district general development standards.

Table 30.15-B

SPECIAL PURPOSE DISTRICTS GENERAL DEVELOPMENT STANDARDS

Development Feature	Requirement by Zoning District			
	CE	CEM	MS	SR
Minimum Site Size	N/A	20 acres minimum	N/A	N/A
Residential Density Maximum	N/A		1 dwelling unit for each 2,250 sq. ft. of lot area. On lots having a width of 90 feet or greater, there shall be not more than 1 dwelling unit for each 1,800 sq. ft. of lot area.	N/A
Lot Coverage (2)	N/A		Lots with 1 dwelling unit and lots with multiple residential dwelling units: 50 percent maximum including all accessory buildings. All other uses: N/A	N/A
Minimum Setbacks Required (2)	See Section 30.30.050 f		Hospital: N/A	N/A

Development Feature	Requirement by Zoning District			
	CE	CEM	MS	SR
	or setback exceptions		1 dwelling unit or multiple residential dwelling units shall be subject to the R-2250 standards (3) All other uses shall be subject to C3 Standards (4)	
Street Front	25 feet	N/A		N/A
Street Side	5 feet	N/A		N/A
Interior not adjacent to residential zones	None	N/A		N/A
Interior adjacent to residential zones	N/A	N/A	10 feet	N/A
Maximum Height Limit (1)(2)(3)	35 feet	N/A	Properties with a frontage less than 90′ have a maximum height limit of 26′ District I—Properties with a frontage exceeding 90′ have a maximum height limit of 41′ District II—Properties with a frontage exceeding 90′ have a maximum height of 50′ District III—Properties with a frontage exceeding 200′ have a maximum height of 90′	N/A
Landscaping (2)	As required by Chapter 30.31 (Landscaping)	N/A	As required by Chapter 30.31 (Landscaping)	
Rooftop Equipment	See Chapter 30.30 (Site Planning)	N/A	See Chapter 30.30.020 (Site Planning)	N/A
Lighting	See Chapter 3	N/A	See Chapter 30.30.040 (Site Planning)	N/A

Development Feature	Requirement by Zoning District			
	CE	CEM	MS	SR
	0.30 (Site Planning)			
Trash Collection Areas	See Chapter 3 0.30 (Site Planning)	N/A	See Chapter 30.30.030 (Site Planning)	N/A
Parking and Loading	As required by Chapter 3 0.32 (Park ing and Loading)	N/A	As required by Chapter 30.32 (Parking and Loading)	N/A
Design Review	As required by Chapter 30.47 (Desig n Review)		As required by Section 30.15.040(F) Development Plan review	

Notes:

(1) For exceptions to height limits for wireless telecommunications facilities, see Chapter 30.48.

(2) For lot coverage, setback, height, and landscaping requirements related to solar energy equipment, see Section 30.30.050.

(3) In the MS zone only, 1 dwelling unit shall comply with R-2250 standards and multiple residential dwelling units shall comply with the R-2250 standards, except for height and stories, which shall be determined by the district.

(4) All parking structures shall be subject to the PS Overlay required setback standards, see Section 30.23.040(A).

E. Regulations in Major Ridgeline Areas, Secondary Ridgeline Areas, and Blue-Line Stream Areas. *All subdivisions, development, building, construction, and grading in the SR Zone shall be regulated by Sections 16.04.030, 16.04.003, and 16.04.037 of this code as related to major ridgeline areas, secondary ridgeline areas, and blue-line stream areas. Any exception to the standards contained in these sections shall only be made by the planning commission/city council at a public hearing.*

F. Development Plan Review. The following regulations shall apply to areas within the SR Special Recreation Zone.

1. The plans for any site development or for any building, construction, expansion, alteration, or for the increase or decrease of any existing area, or area to be acquired and

developed for any permitted private or accessory use shall be submitted for review to the planning commission or to the city council with a recommendation from the planning commission for precise plan of design overlay zone (PPD) applications. Notwithstanding the above, the director of community development shall have the authority to review and approve minor alterations to project sites when, in his or her opinion, there are minimum impacts to surrounding uses and properties. Applications which involve wireless telecommunications facilities shall comply and be designed in accordance with the standards specified in Chapter 30.48 of this code. The director of community development shall set a public hearing before the planning commission. The director of community development or city clerk shall give notice of the public hearing to be held by the planning commission. The notice of the public hearing shall contain the date, time and place of the hearing and a general description of the proposed development and shall follow the requirements of Chapter 30.61, Hearings and Public Notice.

2. Development plans shall be reviewed as to their conformance with the comprehensive general plan, public access and circulation, effect of the design and construction of buildings, facilities, auxiliary uses and general plan of development upon the existing or planned uses and development of the surrounding private or public property, and the recreational objectives and services being offered to the public. For applications involving wireless telecommunications facilities, the planning commission shall also consider specific physical or technical factors which make infeasible the use of or co-location upon a preexisting antenna support structure or preexisting building or structure.

3. Development plans shall be approved, approved subject to conditions or denied by the planning commission. Conditions of approval may include, but shall not be limited to the following areas: setbacks, height, landscaping, access and circulation, parking, architectural design, site design, layout and configuration, hours of operation, security, buffering and screening techniques. The decision of the planning commission may be appealed to the city council pursuant to the provisions of Chapter 2.88 of this code relating to the uniform appeal procedure.

4. For the duration of approved development plans for projects in the SR Special Recreation Zone, see Chapter 30.41.

5. The director of community development shall have the authority to modify approved landscape plans when modifications are consistent with California-friendly plantings or California-friendly landscaping as defined in Section 13.36.040 of this code. (Ord. 5847 § 5, 2015; Ord. 5747 § 17, 2011; Ord. 5692 § 21, 2010; Ord. 5677 § 1, 2009; Ord. 5645 § 16, 2009; Ord. 5453 § 5, 2005: Ord. 5399 Attach. A, 2004)

L94-11 The comment opines that the City of Glendale did not fully evaluate potential noise impacts of the Project. Please refer to Topical Response No. 8 for amplification and clarification of and a supplemental discussion on potential construction noise impacts related to pipeline construction. Section 4.10 of the Draft EIR includes applicable thresholds of significance and comparison of the Project's anticipated noise levels to the thresholds of significance. The construction noise modeling output files were

inadvertently omitted from the Draft EIR's technical appendices. The construction noise modeling output files are included in Appendix J of the Final EIR. The construction noise data included in Table 40 of the Draft EIR is accurate and construction noise impacts would be below applicable thresholds of significance at all receptors modelled. Table 37 and Appendix J of the Final EIR have been accordingly updated.

L94-12 The comment concludes that the Project would result in significant impacts and "community compatibility" issues involving aesthetics, land use, noise, and vibration. The commenter is directed to Topical Responses No. 4, 8 and Draft EIR Section 4.9 for land use analysis, and the other responses to the Commenter's letter. See Responses L94-8, L94-9, and L94-10.

L94-13 to

L90-14 Section 15126.6(d) of the State CEQA Guidelines states that alternatives analysis need not be presented in the same level of detail as the assessment of the proposed Project. Rather, the EIR is required to provide sufficient information to allow for meaningful evaluation, analysis, and comparison with the proposed Project. If an alternative would cause one or more significant impacts in addition to those of the proposed Project, analysis of those impacts is to be discussed, but in less detail than for the proposed Project. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the project objectives, reduce project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Please also refer to Topical Response No. 10.

L94-15 Stationary Source Regulatory Measure CMB-01 is an emissions reduction strategy not a regulatory requirement for consistency with the Air Quality Management Plan. Section 4.2, Air Quality, of the Draft EIR discusses the Project's consistency with the Air Quality Management Plan. Section 5.4.4 of the Draft EIR notes that the use of fuel cells would meet the Project objectives. The LFG would need to be treated to a higher standard for use in fuel cells compared to use in reciprocating internal combustion engines. This additional LFG pre-treatment would require more equipment and a larger LFG treatment area than that needed for the Project.

Table 53 of the Draft EIR presents operational and planned LFG to energy projects in the State of California. As shown in Table 53, of the more than 100 projects, there are no operational and only one planned project that proposes fuel cell technology for LFG. The planned fuel cell project would be located at Coyote Canyon Landfill in Newport Beach and would generate approximately 4 MW of electricity using 2.7 million standard cubic feet of LFG per day. On June 16, 2021, the City of Glendale learned from Orange County Waste and Recycling that the planned fuel cell project at Coyote Canyon has been cancelled. The fuel cell project was cancelled because the technology supplier, Fuel Cell Energy, elected to no longer participate in the planned project because the fuel cell

technology required LFG with a minimum methane content of 48 percent. LFG at Coyote Canyon has approximately 45 percent methane content. Orange County Waste and Recycling is evaluating converting the LFG to RNG which reportedly requires LFG with a minimum methane content of 45 percent, however, Orange County Waste and Recycling is not sure if the 45 percent methane content can be maintained over time to make an RNG project feasible. Orange County Waste and Recycling further reported that the cost of converting LFG to RNG is approximately $9 per million cubic standard feet of LFG (personal communication with Robert Peace, Orange County Waste and Recycling, Renewable Energy Manager).

In consideration of the above information as well as the fact that LFG at Scholl Canyon Landfill only has a methane content of approximately 36 percent, which is well below the applicable 48 percent methane content for the fuel cell technology considered at Coyote Canyon Landfill, a fuel cell alternative was determined not technically or economically feasible at the scale required and therefore was not considered for further analysis. Please also refer to Topical Responses No. 5 and 10. The Project would not have a significant health risk impact.

L94-16 As discussed in Section 4.2, Air Quality, and Section 4 overall of the Draft EIR, the Project does not have any unmitigable air quality, or any other environmental impacts that microturbines or any other alternative would eliminate. Please also refer to Topical Responses No. 5 and 10. Note that Topical Response No. 5 included updated health risk assessment results related to an assumed increase in LFG available at Scholl Canyon Landfill as well as the presence additional compounds including dioxins.

L94-17 The comment notes that the Draft EIR states that a convert LFG to compressed natural gas alternative would have lower operation phase emissions of air pollutants, greenhouse gases, and noise compared to combustion of the LFG in internal combustion engines to generate electricity. The commenter requests that because of this reason, a convert LFG to compressed gas natural alternative should be screened because of the health risks associated with the Project. The Draft EIR states the emissions and noise associated with hundreds of truck fueling trips per day would likely result in comparable operational air pollutant emissions and noise as the proposed Project. Please refer to Topical Response No. 5 which demonstrates the Project would have less than significant health risk impacts, even when considering the potential impacts of an increased volume of available LFG combusted. Considering these facts and because the convert LFG to compressed natural gas alternative would not substantially decrease operation phase emissions, a health risk assessment was not needed for comparison to the Project's potential health risk impacts. Please also refer to Topical Response No. 10. Additionally, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. The additional detailed information requested by the commenter would not change the analysis of Project environmental impacts in the Draft EIR and is not required by CEQA.

L94-18 The analysis of potential air quality, energy, greenhouse gases, hazardous and hazardous materials, and noise impacts of Alternative 4 is sufficient to make reasonable comparisons to the Project's potential and their comparison to the Project's potential air quality, energy, greenhouse gases, hazardous and hazardous materials, and noise impacts. For example, Alternative 4 and the Project would include the same primary sources of air emissions and noise. The conclusion that Alternative 4 would have incrementally greater air quality and noise impacts compared to the Project is based on the fact that the sources of air emissions and noise would operate much closer to sensitive receptors compared to the Project. Alternative 4 would additionally involve more energy use and hazards associated with conveying the LFG through the 6-mile-long LFG pipeline to Grayson that the Project would avoid.

L94-19 The Commenter expresses an opinion or preference concerning which alternative they would prefer and claims the Draft EIR did not adequately demonstrate that several of the alternatives not selected for further analysis fail to meet most of the basic Project Objectives. Please also refer to Topical Response No. 10 and Response L94-15.

L94-20 Please refer to Topical Response No. 8.

L94-21 Please refer to Topical Response No. 8.

L94-22 Please refer to Topical Response No. 8.

L94-23 The Project objectives were refined between the preparation of the Final MND and Draft EIR. The City has elected to utilize a single and critical Project objective which led to the evaluation of more alternatives to the Project that would either meet or partially meet the Project objective. The commenter notes that this single Project objective leads to a conclusion that only the proposed Project would meet the Project objective and narrows further study of alternatives. Section 5 of the Draft EIR correctly concludes that Alternatives 2, 3, and 4 would meet the Project objective. Of the four alternatives evaluated, only Alternative 1 (No Project) was shown not to meet the Project objective. Please also refer to Topical Response No. 10.

L94-24 The LFG pipeline would be purged of LFG as part of abandonment. The LFG would be displaced from the LFG pipeline by either pushing the gas from Grayson Power Plant to Scholl Canyon Landfill or by applying a vacuum to the pipeline from Scholl Canyon Landfill. The purged LFG would be collected at Scholl Canyon Landfill and combusted in the flares to avoid venting of the LFG to the atmosphere which would have greater GHG and odor impacts. The Draft EIR has been updated to reference the applicability of SCAQMD Rule 1149 which the City will adhere to during pipeline decommissioning.

L94-25 The commenter notes that the area disturbance estimates for the Project exceed the estimate used to quantify grading emissions. The area of Project disturbance includes all areas where construction would occur and includes graded areas as well as areas that would be disturbed from non-grading related activities. For example, the water and

natural gas pipelines will be primarily installed above ground except for road crossing and is not expected to require grading for installation. The area proposed to be graded is the power generation facility and water tank area comprising 2.07 acres as listed in Table 1 of the Draft EIR. The 3 acres used to estimate grading construction emissions is therefore overestimated and conservative for purposes of evaluating the potential air quality impacts of grading for the Project.

L94-26 Pursuant to SCAQMD Rule 1110.2, the engines are required to meet the NO_X emission levels of 11 ppmv @ 15 percent O_2. Additionally, the engines are required to have continuous emission monitoring system (CEMS) to ensure the engines comply with the emission limits during normal operation. Similar to NO_x, the engines are required to have CEMS for CO as well.

L94-27 The NO_X, CO, and VOC values initially presented in Table 12 reflected 30-day average emissions instead of maximum daily emissions. However, the offset allocations from SCAQMD priority reserve will reduce the net emission increase of these pollutants below the significance thresholds. Nonetheless, air dispersion modeling was performed to analyze the ambient air quality impact of the Project. As described in Appendix B.3.1, the model was based on the highest emissions scenario in 1-hour, 8-hour, 24-hour average, and annual average period time.

L94-28 The AERMOD output presented in Table 18 is based upon emissions calculated for the worst-case scenarios as described in Table 2 of Appendix B.3.1. For example, NO_X emissions in one-hour average period were calculated using controlled NO_X emission of 11 ppmv, uncontrolled emission of 23.50 lbs per startup and uncontrolled emissions of 7.40 lbs per shutdown.

L94-29 The manufacturer specification for maximum heat input rating of 23.9 mmbtu/hr is based on lower heating value. The emission inventory used 26.34 mmbtu/hr as the maximum heat input rating based on higher heating values as indicated in the equipment specification provided in Appendix B.2.3.

L94-30 Section 3.2 of the Draft EIR includes a discussion on related and cumulative projects, including extensive due diligence and correspondence with other adjoining municipalities and utility companies to identify and screen potential cumulative projects for consideration. Air quality by its very nature is a cumulative issue for the entire region. However, the Draft EIR demonstrates that Project's contribution to regional air quality and combatively would be less than significant because the Project's emissions are below the applicable mass emissions thresholds after incorporation of regulatory required offsets. The Project's analysis of potential cumulative air quality impacts had been augmented in the Final EIR to further demonstrate the Project would not result in a significant air quality impact in consideration of its proximity to Lower Scholl Canyon Park and a future recreation land use after landfill closure. The comment is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L94-31 The GHG emissions presented in Appendix F of the Draft are based on available LFG production estimates at the time the Draft EIR was prepared. The GHG analysis in the Final EIR is based on updated LFG production data. Please refer to Topical Response No. 5 for the updated GHG analysis.

L94-32 Please refer to Response L94-31.

L94-33 Please refer to Topical Response No. 7.

L94-34 Please refer to Topical Response No. 9.

L94-35 LASAN is on the City of Glendale's list of interested parties to receive CEQA notices on the Project.

L95 - Responses to Comments from Los Angeles City Council District 14, received September 25, 2020

L95-1 The comment is a general introductory statement and invites staff to call a provided number if there are any questions or concerns about the submitted comments. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. If there are any questions regarding the submitted comments the provided phone number will be contacted.

L95-2 The comment starts with a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Commenter's statement that the Project and the Grayson Repowering Project are related project is addressed in Topical Response No. 2. In addition, an EIR's evaluation of cumulative impacts may be based on a list of past, present, and probable future projects producing related impacts, including, if necessary, projects outside the lead agency's control. 14 Cal Code Regs §15130(b)(1)(A). The basic standard for compiling such a list is that projects should be included when it is reasonable, feasible, and practical to do so, given the information available about the projects, and when failure to include such projects would lead to an inadequate analysis of the severity and significance of the cumulative impacts in question. Grayson Repowering Project is a "related project" under CEQA for purposes of the required cumulative impacts analysis.

L95-3 The comment notes disappointment that a public scoping meeting was not held in the community of Eagle Rock. The City of Glendale as Lead Agency did conduct public scoping meetings in the City of Glendale and fulfilled CEQA requirements for conducting such meetings. Any member of the public, regardless of home address was welcome to

participate in the public scoping meetings. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L95-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L95-5 The comment is a general statement about the commenter's opinion of (or preference about) the Project and voices disappoint from a perception that the City of Glendale is not addressing Eagle Rock concerns. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA; all required public noticing was completed and the public was provided with ample opportunities to comment. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L95-6 Alternative 2 which is described and evaluated in Section 5 of the Draft EIR evaluates cleaning the LFG, converting it to natural gas, and conveying the natural gas into a SoCal Gas company natural gas pipeline. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L95-7 Alternative 4 which is described and evaluated in Section 5 of the Draft EIR evaluates relocating the proposed internal combustion engine generators at Grayson Power Plant. The LFG compression and cleanup system would be located at Scholl Canyon Landfill. The cleaned LFG would be transported from Scholl Canyon Landfill to Grayson Power Plant through the existing LFG pipeline. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L95-8 Please refer to Topical Response No. 1. The Draft and Final EIRs demonstrate that potentially significant environmental impacts have been mitigated to less than significant levels.

L95-9 The comment is a general statement about the commenter's opinion of (or preference about) the Project and voices disappointment from a perception that the City of Glendale is not addressing City of Los Angeles concerns. Glendale held multiple meetings on the prior MND (not adopted) for this Project and responded to Eagle Rock's comments on the MND. For the Project's Draft EIR which is the same project previously evaluated in the MND and on which Eagle Rock extensively commented - Glendale conducted additional meetings and this Response to Comments responds to Eagle Rock's comment letters. The comment does not identify a specific environmental analysis or CEQA issue relative

to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L95-10 The comment expresses support of all comments within comment letter L94, submitted by LASAN on September 25, 2020. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L95-11 The comment is a request for the City of Glendale to conduct public meetings in Eagle Rock. Please refer to L95-4. Glendale is the Lead Agency, and the proposed Project is located within Glendale. CEQA does not require Glendale to conduct public meetings in every jurisdiction that requests meetings. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L95-12 Please refer to individual environmental impact analyses within Section 4.0 of the Draft EIR for analyses of cumulative impacts. Please refer to Section 5.6.6 of the Draft EIR for a discussion of the environmentally superior alternative. Please also refer to Topical Response No. 10.

L95-13 The comment is a general statement about the commenter's opinion of the environmental impact analysis (or preference about) the Project and does not identify any inadequacies in the Draft EIR. All required notices for the Draft EIR and prior MND for the same project, were provided. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L96 - Responses to Comments from David Eder, received September 25, 2020

L96-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L96-2 Please refer to Topical Response No. 9.

L96-3 Please refer to Topical Responses No. 2 and 7.

L96-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's

statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 9.

L97 - Responses to Comments from Hassan Rad, received September 25, 2020

L97-1 This is an email thanking Paul Cobian for his submission of the Los Angeles Sanitation and Environment comment letter on behalf of the City of Los Angeles. The Los Angeles Sanitation and Environment comment letter was received in a separate email on September 25, 2020. Please see responses to comments of L94 from Los Angeles Sanitation and Environment, received September 25, 2020.

L98 - Responses to Comments from Individual, received September 25, 2020

L98-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L99 - Responses to Comments from Kim Turner, received September 25, 2020

L99-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response Nos. 1 and 5.

L100 - Responses to Comments from Lynn Woods, received September 25, 2020

L100-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L100-2 Please refer to Topical Response No. 9.

L100-3 Please refer to Topical Responses No. 1, 5, and 7.

L100-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L100-5 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L100-6 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L101 - Responses to Comments from Mary Fischer, received September 25, 2020

L101-1 Please refer to Topical Response No. 1.

L101-2 Please refer to Topical Responses No. 5, 7, 8, and 9.

L101-3 Please Refer to Topical Response No. 2.

L101-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L102 - Responses to Comments from Melissa Estrada, received September 25, 2020

L102-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L102-2 Please refer to Topical Response No. 9.

L102-3 Please refer to Topical Response No. 5.

L102-4 Please refer to Topical Response No. 6.

L102-5 Please refer to Topical Response No. 2.

L102-6 Please refer to Topical Response No. 1.

L102-7 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's

statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L103 - Responses to Comments from Susan Leising, received September 25, 2020

L103 The comments within this letter directly reiterate comments previously submitted by Marwan and Amy Ataya on September 6, 2020. Please refer to responses to comments of L40 from Marwan and Amy Ataya, received September 6, 2020.

L104 - Responses to Comments from Claudia Puig, received September 26, 2020

L104 All comments within this letter (L104-1 through L104-7) directly reiterate comments previously submitted by the Coalition for Scholl Landfill Alternatives (CSLA) on September 23, 2020. Please refer to responses to comments of L84 from CSLA, received September 23, 2020.

L105 - Responses to Comments from Madeline Wills, received September 26, 2020

L105-1 Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significant cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Responses No. 5, 6, 7, and 9.

L106 - Responses to Comments from Cyndi Otteson, received September 27, 2020

L106-1 Please refer to Topical Responses No. 1 and 5.

L106-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 9.

L107 - Responses to Comments from Deirdre Wills, received September 27, 2020

L107-1 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. However, the Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than continuing to flare the LFG and lose the energy created from the required combustion, the proposed Project seeks to capture that same LFG and beneficially use it to generate power to assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in

operation. Based on the results of the health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Draft EIR, the toxic emissions from the proposed Project will not expose the nearest sensitive receptors to significant cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Responses No. 5, 7, and 9.

L108 - Responses to Comments from Myanna Dellinger, received September 27, 2020

L108-1 The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L108-2 Please refer to Topical Response No. 9.

L108-3 Please refer to Topical Response No. 2.

L108-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L108-5 The comment states the deadline for the public comment period for the Draft EIR. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L109 - Responses to Comments from Allan Herbert, received September 28, 2020

L109-1 The comment is a general statement expressing the commenter's support of the Project. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110 - Responses to Comments from Glenoaks Canyon Homeowners Association (GOCHA), received September 28, 2020

L110-1 This comment was submitted by Marie Freeman on behalf of the Glenoaks Canyon Homeowners Association (GOCHA) and introducing attached comment letters from GOCHA and Soil Water Air Protection Enterprise (SWAPE).

L110-2 The comment introduces GOCHA and identifies GOCHA's relationship to Glendale. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-3 CEQA requires the Draft EIR to assess impacts of the proposed Project. Therefore, the Project has no past or current impacts because it did not previously exist and does not currently exist. CEQA Guidelines section 15002 (a) identifies the basic purpose of CEQA is to "(1) Inform governmental decision makers and the public about the potential significant environmental impacts of proposed activities." The analysis of environmental impacts of the proposed Project, is set forth in Section 4.0 of the Draft EIR. The analysis of related projects and cumulative impacts are set forth in Sections 3.2 and 4.0 of the Draft EIR.

The City as Lead Agency takes responses to public comments seriously. CEQA jurisprudence, as summarized in the Continuing Education of the Bar (CEB) Treatise "Practice Under the California Environmental Quality Act", Kostka Zischke, March 2021, ("CEB Treatise"), section 6.42, makes clear that public comments not based on a specific factual foundation do not constitute substantial evidence. Pub Res C §21082.2(c). "Opinions expressed by members of the public do not qualify as substantial evidence if they are not based on personal observation or experience. *Gentry v City of Murrieta* (1995) 36 CA4th 1359, 1417 (residents' opinions that road widening would prevent continued recreational use and have other impacts was not substantial evidence because there was no specific factual foundation for the claims); *Newberry Springs Water Ass'n v County of San Bernardino* (1984) 150 CA3d 740 (neighbors' concerns about odors and flies from dairy were not substantial evidence, because no specific evidence was given about flies or odors at other dairies or the project).

"Complaints, fears, and suspicions about a project's potential environmental impact likewise do not constitute substantial evidence. See *Joshua Tree Downtown Bus. Alliance v County of San Bernardino,* 1 CA5th at 690 (citing this book); *Taxpayers for Accountable Sch. Bond Spending v San Diego Unified Sch. Dist.*, 215 CA4th at 1042 (general objection to noise in neighborhood not substantial evidence); *Porterville Citizens for Responsible Hillside Dev. v City of Porterville,* 157 CA4th at 905 (general objections to project density and quality were not substantial evidence of environmental impact); *Bowman v City of Berkeley* (2004) 122 CA4th 572, 588 (generalized aesthetic objections to project without regard to surrounding context of urbanized development were not substantial evidence); *San Joaquin Raptor/Wildlife Rescue Ctr. v County of Stanislaus* (1996) 42 CA4th 608 (conclusory statement about cumulative impact was not substantial evidence); *Lucas Valley Homeowners Ass'n v County of Marin* (1991) 233 CA3d 130 (expressions of generalized concerns and fears about traffic and parking impacts, and anecdotal statements about parking problems at another facility, are not substantial evidence); *Leonoff v Monterey County Bd. of Supervisors* (1990) 222 CA3d 1337 (opponents' subjective concerns and unsubstantiated opinions about dangerous traffic conditions are not substantial evidence); *Perley v Board of Supervisors* (1982) 137 CA3d 424 (neighbors' unsubstantiated fears and concerns about project's impacts lacked objective basis for challenge and did not constitute substantial evidence).

"Speculation about a project's impacts also has no evidentiary value. *Friends of Riverside's Hills v City of Riverside* (2018) 26 CA5th 1137, 1152 (speculation that final plans for development might not comply with city standards for protection of hillsides was insufficient to show significant environmental impact might occur); Keep Our Mountains Quiet v County of Santa Clara, *236 CA4th at 734* (claimed noise impacts on trails that might be established in future held to be speculative); *Friends of Davis v City of Davis* (2000) 83 CA4th 1004, 1020 (assumption of competitive impact from retail tenant speculative); *Pala Band of Mission Indians v County of San Diego* (1998) 68 CA4th 556, 580 (comment letter submitted by counsel for opponents consisting almost exclusively of "mere argument and opinion" did not constitute substantial evidence); *Citizen Action to Serve All Students v Thornley* (1990) 222 CA3d 748 (speculation and generalizations about traffic, parking, economic effects, and earthquake safety did not constitute substantial evidence); *Snyder v City of S. Pasadena* (1975) 53 CA3d 1051, 1060 n4 (public comment that unforeseen factors may lead to traffic impacts of street closing plan properly disregarded as speculation)."

L110-4 The 2.2-acre area referenced in the comment only includes the location of the proposed Project. The Project also includes areas of development related to the installation of the proposed water and natural gas pipelines as well as vegetation disturbances to meet code requirements for fire protection. The Draft EIR evaluates impacts of the Project beyond the 2.2 acres where environmental impact from the proposed Project may occur. For example, the Draft EIR evaluates short-term construction and long-term operation noise impacts to the nearest residential and recreation receptors. The areas evaluated for potential impacts in the Draft EIR vary based on the environmental resource category considered (i.e., air quality, aesthetics, biological resources, noise, transportation and circulation) due to differences in environmental setting, regulatory framework, or potential for the Project to impact that specific resource category. Please refer to Sections 3.0 and 4.1 through 4.14 of the Draft EIR for a description of the environmental setting, regulatory framework, methodology, and analysis of the Project's potential environmental impacts. Please also refer to Topical Response No. 2.

L110-5 Please refer to Topical Responses No. 1, 3, 4, and 5.

L110-6 Please refer to Topical Response No. 2.

L110-7 Please refer to Topical Response No. 2.

L110-8 The commenter states "The descriptions and justifications in the Draft EIR often lack specificity or accuracy so reliable conclusions cannot be drawn about whether an impact is significant or not." The comment is a generalized statement and does not identify a specific description or justification used in the Draft EIR that is inaccurate or lacks specificity. See also Response L110-3. L110-9 Please refer to Topical Response No. 5.

L110-10 The commenter states “Insufficient or unreliable information is presented, so it is difficult to draw valid conclusions or make valid comparisons among alternatives and the Project.” The comment is a generalized statement and does not identify specific information in the Draft EIR that the commenter believes are insufficient or unreliable. The commenter’s statement is included in the Final EIR for the decision-maker’s consideration as part of the City’s deliberations on the Project. Please also refer to Topical Response No. 10.

L110-11 CEQA Guidelines Section 15126.6(a) states that “an EIR shall describe a range of reasonable alternatives to the project or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.”

Potential environmental impacts of the alternative and the proposed Project are compared for each environmental topic area. Where, based on objective criteria, the impact of the alternative would be clearly less than the impact of the proposed Project, the comparative impact is said to be “less.” Where the alternative’s net impact would clearly be more than the proposed Project, the comparative impact is said to be “greater.” Where the impacts of the alternative and Project would be roughly equivalent, the comparative impact is said to be “similar” (Section 5.5 of the Draft EIR). For additional information on the analysis format please refer to Section 5.5 of the Draft EIR. Section 15126.6(d) of the State CEQA Guidelines states that alternatives analysis need not be presented in the same level of detail as the assessment of the proposed Project. Rather, the EIR is required to provide sufficient information to allow for meaningful evaluation, analysis, and comparison with the proposed Project. If an alternative would cause one or more significant impacts in addition to those of the proposed Project, analysis of those impacts is to be discussed, but in less detail than for the proposed Project. Please also refer to Topical Response No. 10.

L110-12 The comment expresses an opinion that Alternative 2, converting LFG to natural gas is the most protective of the environment and surrounding community compared to the Project. The Comment makes reference to a letter attached to the GOCHA comment letter that alleges the Alternatives analysis is inadequate. That letter is addressed separately. Please also refer to Topical Responses No. 5 and 10.

L110-13 CEQA Guidelines Section 15126.6(a) states that “an EIR shall describe a range of reasonable alternatives to the project or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.” The Lead Agency need not select every conceivable alternative, even ones selected by commenters. Los Angeles County Sanitation District routinely analyzes the methane content and concentrations of various potential constituents of concern in the LFG collected from the Scholl Canyon Landfill. Los Angeles County Sanitation District

LFG testing has not included analyzing for the presence of dioxins. City of Glendale analyzed the exhaust of a Scholl Canyon Landfill LFG-fueled boiler at Grayson Power Plant in November 2018 for the presence of dioxins, which were detected at low concentrations. The Project's gas treatment system and selective catalytic reduction for emissions control would be effective in removing dioxins, if present, in the LFG prior to release into the air through the reciprocating internal combustion engine generator exhaust stream. However, it has been conservatively assumed for purposes of the Project's health risk assessment that the same dioxin concentrations detected in the LFG-fueled boiler exhaust at Grayson Power Plant could be present in the flare exhaust at Scholl Canyon Landfill. As such, the City of Glendale has updated the Project's health risk assessment to consider the flares as a source of dioxin emissions. The results of the updated health risk assessment, shown in Table 20 and 21 of Section 4.2, Air Quality, of the Final EIR, air emissions from the proposed Project will not expose the nearest sensitive receptors to significant cancer risks, non-cancer acute risks, and non-cancer chronic risks. Please also refer to Topical Responses No. 5 and 10.

L110-14 Please refer to Topical Responses No. 1, 4, 5, 6, 7, 8, and 9.

L110-15 The alternatives selected for analysis represent a reasonable range that could potentially feasibly meet or partially meet the Project objectives, reduce project impacts is some areas, and which are either currently being used to manage LFG in existing landfills elsewhere, or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Section 15126.6(d) of the State CEQA Guidelines states that alternatives analysis need not be presented in the same level of detail as the assessment of the proposed Project. Rather, the EIR is required to provide sufficient information to allow for meaningful evaluation, analysis, and comparison of the reasonable range of alternatives with the proposed Project. The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes. The Draft EIR demonstrates through applying the applicable thresholds of significance that the Project's potential environmental impacts would be less than significant with mitigation. Please also refer to Topical Responses No. 2 and 10.

L110-16 The comment introduces an outline of highlights of the Scholl Canyon Landfill Work Group's comments and questions. The statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-17 Please refer to Topical Response No. 4.

L110-18 The Project is required by SCAQMD's New Source Review Rule 1303 regulations to implement Best Available Control Technology as a condition of air permit issuance. Emissions reduction credits are required by regulation and SCAQMD cannot issue an air permit for the Project without verification that the permittee has obtained and surrendered

the required offsets for the new emissions sources. Additionally, Section 4.2 of the Draft EIR and Topical Response No. 5 further demonstrate that potential air quality impacts of the Project would be less than significant.

L110-19 Please refer to Section 4.3.4 of the Final EIR for an analysis of Project impacts including wildlife movement and migratory corridors as well as sensitive species. This section includes updates made to the biological resources impact analysis and mitigation measures based on consideration of California Department of Fish and Wildlife comments received on the Draft EIR. Please refer to Response to L117 below.

L110-20 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that could potentially meet or partially meet the Project objectives, reduce Project impacts is some areas, and are either being used to manage LFG or being reasonably considered for use at existing landfills in California on a similar LFG production scale to the Scholl Canyon Landfill. Please also refer to Topical Responses No. 10.

L110-21 Please refer to Topical Responses No. 6 and 9.

L110-22 The commenter states that the baseline emissions from the existing flares should be added to the Project greenhouse gas emissions then compared to the mass emissions threshold of significance. Every standard cubic foot of LFG recovered would be combusted in either the reciprocating internal combustion engines, regeneration flare, or existing flares. The same standard cubic foot of LFG cannot be combusted simultaneously in more than one combustion source. When the Project's reciprocating internal combustion engines are operating, they would combust LFG that would have been otherwise combusted in the existing flares. As a result, the Project's greenhouse gas emissions are primarily based on the total volume of LFG combusted, so, adding the baseline flare emissions to the emissions from combusting LFG in the reciprocating internal combustion engines is double-counting emissions, and that is inconsistent with CEQA's consideration of baseline impacts and would inappropriately elevate baseline. Please also refer to Topical Response No. 5.

L110-23 Please refer to Topical Responses No. 7 and 9.

L110-24 Please refer to Topical Response No. 7.

L110-25 Please refer to Topical Response No. 1 and Responses L94-10 and L94-12.

L110-26 Please refer to Topical Response No. 8.

L110-27 Please refer to Topical Response No. 8.

L110-28 Please refer to Topical Responses No. 6 and 7. The natural gas pipeline is discussed in each environmental resource category in Section 4 of the Draft EIR.

L110-29 Please refer to Topical Response No. 9.

L110-30 The comment expresses support of Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 10.

L110-A-1 Please refer to Topical Response No. 4.

L110-A-2 Please refer to Topical Response No. 4 and Responses L94-10 and L94-12.

L110-A-3 Please refer to Topical Response No. 1. The Lead Agency has to evaluate the impact of the proposed Project. A future project for which there are no details susceptible to accurate stable description; such an analysis would require speculation. Speculation about a project's impacts has no evidentiary value. *Friends of Riverside's Hills v City of Riverside* (2018) 26 CA5th 1137, 1152 (speculation that final plans for development might not comply with city standards for protection of hillsides was insufficient to show significant environmental impact might occur); *Keep Our Mountains Quiet v County of Santa Clara*, 236 CA4th at 734 (claimed noise impacts on trails that might be established in future held to be speculative); *Pala Band of Mission Indians v County of San Diego* (1998) 68 CA4th 556, 580 (comment letter submitted by counsel for opponents consisting almost exclusively of "mere argument and opinion" did not constitute substantial evidence).

L110-A-4 The line of site analysis consists of photography taken from various reasonable vantage points. Please refer to https://www.glendaleca.gov/Home/ShowDocument?id=57957 that contains a digital version of the line of site analysis figures. CEQA does not require that an agency conduct every recommended test and perform all recommended research in evaluating a project's environmental impacts (14 Cal Code Regs §15204(a)); See also, *Bay Area Citizens v Association of Bay Area Gov'ts* (2016) 248 CA4th 966, 1017; *Society for Cal. Archaeology v County of Butte* (1977) 65 CA3d 832. See also *Association of Irritated Residents v County of Madera* (2003) 107 CA4th 1383, 1396; *Cadiz Land Co. v Rail Cycle* (2000) 83 CA4th 74, 102; *Riverwatch v County of San Diego* (1999) 76 CA4th 1428, 1447.

L110-A-5 Please refer to Topical Responses No. 1 and 4. CEQA does not require the Lead Agency to speculate about future impacts or whether future changes in regulatory frameworks may occur. See Response L110-A-3 above.

L110-A-6 Please refer to Topical Response No. 5.

L110-A-7 Please refer to Topical Response No. 5.

L110-A-8 Please refer to Topical Response No. 5.

L110-A-9 Please refer to Topical Response No. 5.

L110-A-10 Please refer to Topical Response No. 5.

L110-A-11 Please refer to Topical Response No. 5.

L110-A-12 Please refer to Topical Response No. 5.

L110-A-13 Please refer to Topical Response No. 5.

L110-A-14 Please refer to Topical Response No. 5.

L110-A-15 Please refer to Topical Response No. 5.

L110-A-16 The commenter states that they feel impacts to biological impacts are under-reported, that key species are missing from the assessment, and that the hills serve as a wildlife corridor which could be disrupted by the Project. As stated in in section 4.3.3 of the Draft EIR the analysis presented in Section 4.3.4 below examines the potential impacts to plant and wildlife resources that may occur as a result of implementation of the proposed Project, including both direct and indirect impacts.

The analysis presented in the Draft EIR included field evaluations, which involved reconnaissance-level surveys, habitat assessments, and focused rare plant surveys, as well as a literature review to determine special-status plants, wildlife, and vegetation communities that have been documented within the vicinity of the proposed Project. This information was used to determine a list of sensitive plants and wildlife to be analyzed as part of the impact analysis presented in Section 4.3.4 of the Draft EIR.

As described in Section 4.3.1.4 of the Draft EIR the proposed Project site generally lacks the cover, presence of refugia, or other characteristics conducive the permanent use of and/or movement through a habitat by many native wildlife species. The analysis presented in Section 4.3.4 of the Draft EIR found that construction activities may temporarily limit terrestrial wildlife movement within the proposed Project area; however, the broad geographic range and habitat that occurs in the region would remain available to wildlife.

L110-A-17 The commenter states the Surrounding Uses section does not include the baseball field and golf course built on reclaimed landfill nor the parks and daycare facility located in Eagle Rock. Although Section 3.1.2 of the Draft EIR does not specifically mention the baseball field and golf course that occupy closed areas of the landfill by name, it does refer to the very low density/open space land uses, in which the golf course and baseball field are included. Additionally, Section 3.1.2 of the Draft EIR does state that the community of Eagle Rock occurs immediately south of the proposed Project site but does not specify the location of a day care facility. Where applicable specific issue areas discuss surrounding land uses in more detail. For example, Section 4.3.1.4, in regard to wildlife corridors, states that the BSA is characterized primarily by open space; however much of that land is occupied by the Scholl Canyon Landfill and recreational facilities

(baseball field and golf course). Please also refer to Topical Responses No. 5 and 8 that discuss potential air quality and noise impacts to adjacent existing and future recreation land uses.

L110-A-18 The commenter states that biological data was collected on one day per calendar quarter and does not accurately represent the breadth of plant and animal diversity. As stated in Section 4.3.1.1 of the Draft EIR biologists conducted several surveys over various time periods, within the BSA to evaluate potential Project impacts on biological resources. Field evaluations were conducted on nine separate occasions on October 21, 2015, November 3, 2015, January 15, 2016, and July 11, 2017, April 29, 2019 with focused rare plant surveys occurring on January 15, April 15, and September 8, 2016. The results of these surveys were presented in a BRTR prepared by Stantec, dated July 20, 2017. An additional biological field survey was conducted on April 29, 2019 with the results reported in an updated BRTR included as Appendix C of the Draft EIR. The surveys conducted provided the required level of informational baseline to determine the potential for occurrence of special-status species known to occur in the area because the field conditions in the vicinity of the proposed Project have not changed in any ways that could be reasonably expected to modify the results, e.g., addition of new habitat areas. Based in the information gathered in the field and the fact that the field conditions have not changed in any meaningful way that would change the results, no further surveys were required. The EIR additionally includes mitigation measures (BIO-4, BIO-5, BIO-6, and BIO-7) that require additional pre-construction biological clearance surveys. Please also refer to Responses L117-5, L117-10, L117-11, and L117-13.

L110-A-19 The commenter states that the Habitat Assessment and Biological Surveys were incomplete with data collected on very few days and not at night when nocturnal animals (bats, owls, bears, mountain lions, etc.) are most active. All but one sensitive bat species have a low potential for occurrence or were not likely to occur. As stated in Section 4.3.1.3 of the Draft EIR, although bats were not detected in the BSA, they likely forage and roost in the riparian corridors in the region where insect abundance is high. Because this type of foraging habitat does not occur in the BSA, it is unlikely that bats permanently inhabit or forage in significant numbers within the BSA. During surveys within the larger BSA sign of larger mammals such as mountain lion and bear were not observed that warranted additional nocturnal survey work and other than speculation, the Commenter has not presented any substantial evidence that would compel the need to conduct any further surveys. Please also refer to Response L117.

L110-A-20 The commenter states that noticeably absent from the list of birds was the huge flock of seagulls that are normally present at the landfill and that many species of raptors are also missing. The species list presented in the Section 4.3 of the DRAFT EIR and supporting documents for the proposed Project detailed the species observed during various survey events. It is possible that species such as “sea gulls” or other raptor species, other than those identified in project documents, occur within the general area (“sea gulls” is a common name, for the California Gull and other western gulls are not a California

Species of Special Concern, not federally or state protected, or listed anywhere as a sensitive specifies, and whether or not gulls are if present at the Project site would not have changed the analysis presented in the Draft EIR. Please also refer to Response L117.

L110-A-21 The commenter states that only four mammals are listed: ground squirrels, cottontail rabbits, opossums, and raccoons. Residents have often seen “top tier” mammals as well: bobcats, mountain lions, bears, coyote, and foxes. The survey did not detect bats, but residents see then almost nightly. All but one sensitive bat species had a low potential for occurrence or were not likely to occur. As stated in Section 4.3.1.3 of the Draft EIR, although bats were not detected in the BSA, they likely forage and roost in the riparian corridors in the region where insect abundance is high. Because this type of foraging habitat does not occur in the BSA, it is unlikely that bats permanently inhabit or forage in significant numbers within the BSA. During surveys within the larger BSA sign of larger mammals such as mountain lion and bear were not observed that warranted additional nocturnal survey work. The list of common mammals that have the potential to occur, as presented in Section 4.3.1.3 is not an exhaustive list of all common mammals with the potential to occur. Please also refer to IResponse L117.

L110-A-22 The commenter states California gnatcatchers are present in the area. They did not disappear 20 years ago as the report states. The commenter provides no evidence if their presence. Eagles and turkey buzzards come to the area to dine on carrion. As stated in Table 24 of the Draft EIR Limited marginal habitat or coastal California gnatcatcher occurs within the BSA. The nearest recorded occurrence is approximately 8.0 miles to the east of the BSA; however, this observation was over 20 years ago. The most recent record is from 2005, approximately 10.0 miles to the southeast. During surveys within the BSA no evidence of carrion was observed nor were eagles and turkey vultures observed feeding on carrion. Please also refer to Response L117.

L110-A-23 The commenter states that American peregrine falcon are present and hunt over the Project area. They are not 10 miles away and absent for 20 years as the report suggests. As stated in Table 24 of the Draft EIR marginal habitat for this species occurs within the BSA. The nearest and most recent recorded occurrence, based on available database information, is from within the BSA; however, this species has not been credibly observed within 10 miles of the BSA within the last 20 years. This species was not observed during numerous surveys within the BSA. Please also refer to Response L117.

L110-A-24 The commenter states that a variety of bats have roosts in the areas adjacent to the BSA and forage for food over the BSA. All but one sensitive bat species had a low potential for occurrence or were not likely to occur. As stated in Section 4.3.1.3 of the Draft EIR, although bats were not detected in the BSA, they likely forage and roost in the riparian corridors in the region where insect abundance is high. Because this type of foraging habitat does not occur in the BSA, it is unlikely that bats permanently inhabit or forage in significant numbers within the BSA. Please also refer to Response L117.

L110-A-25 The commenter states that the forest rangers in the area describe the BSA as part of the wildlife corridor that links the Santa Monica Mountains and the San Gabriel Mountains which function as an “island” of native habitat between heavily developed areas. Top tier predators are essential to maintaining the natural balance of wildlife in the area, and further industrialization would repel them.

As described in Section 4.3.1.4 of the Draft EIR The BSA is situated in the San Rafael Hills, which functions as an “island” in which patches of native habitat occur surrounded by the heavily developed City of Glendale and the greater Los Angeles area. This relatively small expanse of native habitat and isolation from wider areas of open space would significantly constrain the movement of certain types of wildlife, particularly megafauna, within the San Rafael Hills and by extension, within the BSA. The proposed Project site is predominantly located in an already disturbed area, generally lacks the cover, presence of refugia, or other characteristics conducive the permanent use of and/or movement through a habitat by many native wildlife species. The analysis presented in Section 4.3.4 of the Draft EIR found that construction activities may temporarily limit terrestrial wildlife movement within the proposed Project area; however, the broad geographic range and habitat that occurs in the region would remain available to wildlife. Please also refer to Response L117.

L110-A-26 The commenter states that “the proposed gas processing equipment and power plant do not ensure protection of the ridgelines, canyons, and streams. Table 25 indicates that plant diversity would be reduced due to the bioacoustics on the proposed Project, and noise would have an adverse effect on animal activity as well. Birds use song to attract mates, and bats use echolocation to find food. Noise would greatly reduce the presence of animals that spread seeds, including deer and other animals that range over the area, leaving scat which reseeds and fertilizes plants.”

The proposed Project will not significantly impact any ridgelines or canyons and has been designed such that all gas and water pipelines would be installed overhead above or below all potentially jurisdictional aquatic features. Only minor impacts to a small section of ridgeline adjacent to existing disturbed lands would occur as a result of ac water tank installation.

More than half of the impacts to vegetation communities and land cover types, as presented in Table 25 of the Draft EIR, are to non-native habitats. Mitigation Measure BIO-7 in the Draft EIR and Mitigation Measure BIO-8 in the Final EIR requires that all impacted plant communities and sensitive habitats be restored/replaced.

As detailed in Section 4.10 of the Draft EIR there will only be a minor increase in ambient noise, on a temporary basis, during construction of the proposed Project. Operation of the Project would result in a very small increase in ambient noise depending on the location of a sensitive receptor. Mitigation Measure BIO-5 requires pre-construction surveys for nesting and breeding birds and the implementation of avoidance measures

which will provide for no activity buffers, during the nesting season, should nesting birds be present within 300 feet of the proposed Project. Please also refer to Topical Response No. 8 and Response L117.

L110-A-27 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. Operation of the proposed Project is not expected to require additional on-site personnel. beyond which currently occur. Please also refer to Topical Response No. 10.

L110-A-28 Please refer to Topical Responses No. 6 and 9.

L110-A-29 Please refer to Section 4.5 of the Draft EIR for analyses concerning geology and soils. Please also refer to Topical Response No. 6.

L110-A-30 The comment asserts conclusions regarding seismic waves without providing evidentiary support. Please refer to Topical Responses No. 6, 7, and 9.

L110-A-31 Please refer to Response L-110-22 and Topical Response No. 5.

L110-A-32 The commenter summarizes the differences in greenhouse gas emissions between the existing flares and the proposed Project. The statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 5.

L110-A-33 Please refer to Topical Response No. 5 for updated greenhouse gas emissions estimates which demonstrate that the proposed Project's potential impacts would be less than significant.

L110-A-34 Please refer to Topical Response No. 5 which includes a discussion on the potential air quality impacts of combusting the maximum volume of LFG expected to be presently available or reasonably foreseeable to be available at Scholl Canyon Landfill during the expected life of the proposed Project.

L110-A-35 Please refer to Responses No. L110-A-33 and L110-A-34

L110-A-36 Please refer to Topical Response No. 5.

L110-A-37 Please refer to Topical Responses No. 6, 7, and 9.

L110-A-38 The commenter states that there are elderly care facilities and childcare centers closer than the five to eight miles referenced in Section 4.7.1.3 of the Draft EIR. The Draft EIR analyzes potential impact from hazards and hazardous materials to both the environment and nearby human receptors regardless of the type of facility, as such the reference to the City of Glendale hospital/medial facilities and elderly care facilities being located eight

to five miles from the Project site was removed from the Final EIR. The analysis is for all facilities being located less than five to 8 miles from the Project Site and the age group serviced and the type of service rendered by the facilities does not change any of the environmental impact determinations in the Draft EIR. Section 4.7 of the Draft EIR analyzes potential impacts from hazards and hazardous materials to both the environmental and nearby human receptors. The presence of elderly care facilities and childcare centers being located less than five to eight miles from the Project site does not change any of the environmental impact determinations in the Draft EIR. The statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-39 The comment is a general statement concerning watered plants' tendency to burn in an intense fire. about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Response L110-3.

L110-A-40 The commenter states that the nearest fire station is in Los Angeles rather than Glendale. Glendale Fire Department Station 23 is located approximately 1.45 miles north of the Project site. There is a Los Angeles Fire Department station located approximately 1.4 miles south of the Project site. Section 4.7 of the Final EIR was revised to note the presence of a Los Angeles Fire Department station located approximately 1.4 miles south of the Project. The City of Glendale has mutual aid agreements for fire response with surrounding municipalities including the Cities of Los Angeles and Pasadena. This mutual aid agreement would apply to a fire at the Project site. The presence or location of the Los Angeles Fire Department station does not change any of the environmental impact determinations in the Draft EIR. The statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-41 The Project will utilize the existing LFG collection and piping system. Potential releases of LFG and associated hazards are analyzed in Sections 4.7 and 4.9 of the Draft EIR. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Response L110-3.

L110-A-42 The commenter states an opinion that hazards impacts of Project operation would be significant. Please also refer to Topical Responses No. 6, 7, and 9.

L110-A-43 The commenter states that the landfill is unlined, that the Project must ensure groundwater protection, and additional groundwater monitoring should be conducted. The Project would include limited activities and sources of potential groundwater degradation. Sources of groundwater contamination during construction would consist of water applied to the ground surface for dust suppression or a spill of petroleum hydrocarbons such as

fuel or lubricants used in construction equipment. Such an accidental surface spill would be subject to immediate clean up protocols. Recycled water from the Los Angeles-Glendale Water Reclamation Plant would be utilized for dust suppression. The source of recycled water would be the same as that used for active landfill activity dust suppressant. Sources of groundwater contamination during operation might occur as a result of an unexpected spill of petroleum hydrocarbons such as oils and lubricants. In the event of an aqueous ammonia spill, the release would be contained within a non-permeable concrete secondary containment and the ammonia would evaporate preventing potential impacts to groundwater. As discussed in Sections 4.7 and 4.8 of the Draft EIR, the Project would not involve large volumes of hazardous materials and would be required to comply with a number of local, state, and federal safety and water quality regulations related to the transportation, use, storage, and disposal of hazardous materials that are intended to be protective of human health and environmental resources. This includes placing hazardous materials and wastes within areas equipped with secondary containment to further reduce the potential impacts of a spill or release. The Project does not include the installation of a conduit to groundwater or involve any other activities that might create a substantial source of potential groundwater degradation which would warrant the installation of groundwater monitoring wells. The statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-44 The commenter requests installation of additional groundwater monitoring wells in Scholl Canyon. Section 20385(a) of Title 27 of the California Code of Regulations requires the discharger of a waste management unit to conduct a water quality monitoring and response program approved by the Regional Water Quality Control Board. The Los Angeles RWQCB adopted Waste Discharge Requirements Order No. R4-2019-0037 (WDR) and Monitoring and Reporting Program No. CI-2846 (MRP) for the active Scholl Canyon Landfill on March 14, 2019 and a site-specific MRP No. CI-10458 (under the RWQCB's General Waste Discharge Requirements for Post-closure Maintenance Order No. R4-2002-022) for the Scholl Canyon Closed Landfill on February 22, 2019. The WDRs and MRPs specify the groundwater monitoring requirements for the active Scholl Canyon Landfill and Scholl Canyon Closed Landfill. The groundwater monitoring system approved by the RWQCB for the active Scholl Canyon Landfill includes 10 on-site monitoring wells immediately down-gradient of subsurface Barrier 1 (M01A, M02B, M03A, M04B, M05A, M06B, M07A, M08B, M09A, and M10B) and three offsite down-gradient monitoring wells (M17A, M18A, and M18B). Groundwater monitoring results are reported semiannually in water quality monitoring reports submitted to the Los Angeles RWQCB. The groundwater monitoring system approved by the RWQCB for the Scholl Canyon Closed Landfill consists of five wells: four monitoring wells MW-1, MW-2, MW-3, and M-12B and one extraction well EX-7. Two wells (MW-3 and M-12B) are located immediately down-gradient of Barrier 2. One well (MW-2) is also located down-gradient of the landfill. One well (MW-1) is located up-gradient of the Closed Landfill. Extraction well EX-7 is also monitored to help evaluate the effectiveness of the barrier. Groundwater

monitoring results are reported semiannually in groundwater monitoring reports submitted to the Los Angeles RWQCB. Please also refer to Responses L110-A-43. The comment is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-45 The commenter states that Per-and Polyfluoroalkyl Substances (PFAS) exceeding remedial objectives have been detected in groundwater monitoring wells. The Project does not include groundwater monitoring or the use of PFAS. Please refer to Response L110-A-46. The comment is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-46 In 1987 a cement-bentonite subsurface barrier (Barrier 1) and groundwater extraction system up-gradient of Barrier 1 were installed at Scholl Canyon Landfill. The effectiveness of the groundwater barrier and extraction system is evaluated pursuant to the Monitoring and Reporting Program for the landfill, issued by the Los Angeles Regional Water Quality Control Board (Regional Water Board). This program requires monitoring the groundwater down-gradient of the landfill. In 2019, as part of a statewide effort to determine whether groundwater is impacted by PFAS and obtain preliminary understanding of PFAS concentrations at landfills, the Los Angeles County Sanitation Districts investigated potential PFAS impacts at the Scholl Canyon Landfill by conducting a groundwater assessment in accordance with a State Water Board investigative order. As described in the Los Angeles County Sanitation Districts report, Groundwater Assessment of Per- and Polyfluoroaklyl Substances (PFAS) for Scholl Canyon Landfill (February 2020), PFAS constituents were detected in all of the samples from down-gradient groundwater wells. The highest levels were detected in the sample from a groundwater extraction well up-gradient of Barrier 1, which discharges the extracted groundwater to the local wastewater sewer and is treated at the Los Angeles-Glendale Water Reclamation Plant. Groundwater samples from the offsite monitoring well near Glenoaks Park had detections of PFOA and PFOS at 5.8 and 3.2 ng/L, respectively. Although PFOA was detected above the California drinking water notification level of 5.1 ng/L at the offsite monitoring well, it is below the California drinking water response level of 10 ng/L. Groundwater in the vicinity of the Scholl Canyon Landfill is not a drinking water source and there are no active drinking water wells located within one-mile radius of the Scholl Canyon Landfill based on the 2019 State Water Board's investigation order to water systems. The City of Glendale Department of Water and Power indicated in their 2019 Water Quality Report that PFOA and PFOS were not present in the water that is served to their customers.

In order to help ensure the quality of the groundwater down-gradient of Scholl Canyon Landfill is protected, the groundwater extraction system up-gradient of Barrier 1 is operated in accordance with the monitoring requirements of the Regional Water Board. Based on the monitoring results and current regulations, the Regional Water Board has not required any additional mitigation measures to be implemented. However, the site operators will continue to work with the Regional Water Board and to monitor regulatory

and scientific efforts to address PFAS and take steps necessary to protect the public health. Please refer to Response L-110-A-45. The comment is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-47 The commenter requests additional groundwater monitoring in Scholl Canyon. The current groundwater monitoring network at the Scholl Canyon Landfill includes 13 groundwater monitoring wells, seven of which are alluvial monitoring (onsite wells M01A, M03A, M05A, M07A, and M09A and offsite wells M17A and M18A) and six of which are bedrock monitoring wells (onsite wells M02B, M04B, M06B, M08B, and M10B and offsite well M18B). Bedrock monitoring wells are designed to monitor the water quality in the fractured bedrock. Please also refer to Responses L110-A-43 to L110-A-46. The comment is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-48 Please refer to Response L-110-A-44.

L110-A-49 Recycled water from the Los Angeles-Glendale Water Reclamation Plant would be utilized for dust suppression. The source of recycled water would be the same as that used for active landfill activity dust suppressant. The Project would utilize the same source of recycled water for dust suppression purposes.

L110-A-50 Secondary containment would consist of steel, concrete, high-density polyethylene, or other suitable material that meets applicable building and fire code requirements. While there may be flexibility in the design and material types of secondary containment that would be confirmed during final design, all materials used would meet regulatory requirements and not lead to new or substantially greater environmental impacts than were disclosed and analyzed in the Draft EIR.

L110-A-51 Any hazardous waste generated by the Project would be handled, stored, and disposed in accordance with applicable regulatory standards.

L110-A-52 The 2,000-gallon lube oil storage tank, 3,000-gallon waste storage tank, and waste accumulation area would be located within the 2.2-acre power plant site. The specific location of the tanks and waste accumulation area would be determined during final design of the Project. The Draft EIR assumes that the tanks and waste accumulation area could be located anywhere within the 2.2-acre power plant site with similar resulting potential environmental impacts.

L110-A-53 The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Responses L94-10 and L94-12.

L110-A-54 The Project is a land use expressly permitted by and would be operated in accordance with the JPA. City of Glendale will operate the Project which is located on County of Los

Angeles owned property, and is a use the is expressly permitted by the JPA. There would be no interface between the Project and the Southern California Edison property.

L110-A-55 The commenter states that there are residential and other land uses within two miles of the Project site that are not identified in the environmental setting. The Draft EIR considers all land uses within resource specific study areas determined by the Project's potential to result in environmental impacts. The statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-56 The purpose of the EIR is to evaluate potential environmental impacts of the Project pursuant with CEQA. The City of Glendale would pursue and be is required to obtain all necessary permits for the Project, including a Conditional Use/Special Recreation Permit, prior to construction and operation. The CEQA process does not dictate that any or all permits necessary for the Project would be issued or that the Project would be implemented. Please also refer to Responses L94-10 and L94-12.

L110-A-57 With respect to consistency finding #1, the proposed Project is consistent with Scholl Canyon Landfill operations which requires the capture and destruction of landfill gases. The Project would not preclude conversion of the landfill to recreation and/or open space after landfill closure. Consistent with the JPA and the General Plan Open Space and Conservation and Recreation Elements. Please refer to Responses L110-A-56, L94-10, L94-12, and Topical Responses No. 1 and 4.

With respect to the general plan consistency finding #2, the Project would not result in an unmitigable significant impact. Please also refer to Topical Responses No. 5, 6, 7, 8 and 9. There is no evidence the Project would impede development of surrounding land uses.

With respect to consistency finding #3, the proposed use of the facility does not adversely affect or conflict with adjacent uses or impede the normal development of surrounding property because the capture and destruction of landfill gases are an operation mandate for the Scholl Canyon Landfill, even after landfill closure. Furthermore, the variance no longer applies to the property as the landfill is a conditionally approved use.

L110-A-58 The Project's potential increase in noise levels would be below the applicable thresholds of significance for CEQA.

L110-A-59 The commenter states an opinion that the noise sources associated with Project operation are very loud. The Project's potential increase in noise levels are below the applicable thresholds of significance for CEQA and the commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-60 Acoustic analysis of the proposed Project's potential operation phase impacts included 31.5-Hz to 8000-Hz octave bands. This range is applicable to evaluating potential noise impacts of the proposed Project because the 31.5-Hz octave band captures the acoustic

energy from 22 Hz to 44-Hz, so it essentially reflects the entire audible frequency range at the lower end. Audible range is typically considered to be between 20 Hz to 20 kHz. Most adults can perceive sound around 20 Hz in the laboratory setting and at levels near 80 dB.

The acoustic energy in the 16-Hz octave band (11 Hz to 22 Hz) is expected to produce levels of below 75 dB at a distance of 100 feet from the power generation facility, which is below the limit of audibility. As a result, there would not be any sensitive receptors exposed to audible noise at 16-Hz octave band. Additionally, this level of airborne acoustic energy is not sufficient to cause any ground-born vibration effects. The nearest residential receptors to the generators are at nearly 3,000 feet away (in the Glenoaks Canyon Road and Blue Hill Road areas). The expected contribution from the proposed Project in 16-Hz octave band would be below 49 dB. This level would not be perceivable to sensitive receptors modeled – even those with hyper-sensitivity to noise - as it is expected to be below the current ambient sound levels in this frequency range, in addition to being much lower than the threshold of perceptibility.

Most of the estimated acoustic energy in 31.5-Hz octave band associated with the proposed Project would be from the reciprocating internal combustion engine generator enclosure walls and roof. The sound level estimates used in the Draft EIR to evaluate potential noise impacts used conservative assumptions regarding the acoustic performance of the enclosures. It is expected that the actual noise emissions from the enclosures would be lower than that assumed in the Draft EIR.

L110-A-61 Noise modeling conducted as part of the Draft EIR utilized baseline noise levels collected at nearby sensitive receptors and site-specific topographic conditions, which are the existing conditions that takes its existing context into consideration. The comment does not specifically identify where the analysis is in fact inadequate. Please refer to Topical Response No. 8 that address potential noise impacts on the Project on adjacent future recreation/open space land uses required by the JPA after landfill closure.

L110-A-62 Ambient noise measurements were collected for 15 minutes at each of the nearest sensitive receptors to the Project site because those receptors would have the highest potential to be affected by Project noise as they would be expected to be subject to higher noise levels than a receptor located farther from the noise source. 15-minute ambient noise measurements are greater than the minimum five-minute measurements required by Section 8.36.030 of the City's Noise Ordinance to establish ambient noise levels, including Leq for the purposes of analyzing potential noise impacts pursuant with CEQA.

L110-A-63 The commenter states that the City did not consider commercial and recreation land use receptors which are an equivalent distance to the residential receptors analyzed in the City's evaluation of potential noise impacts. Residential receptors have lower allowable noise levels than commercial and recreation land use rectors. Therefore, noise levels that

would not significantly impact residential receptors would not be expected to significantly impact non-residential receptors located at an equivalent distance from the noise source. The statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. This is an existing industrial facility and the noise levels analyzed in the Draft EIR take into account the existing operations. Occupational Safety and Health Administration regulations require hearing protection for employees when noise levels exceed 85 dbA averaged over 8 working hours. Employees working at the existing LFG treatment and flaring facility are exposed to elevated noise levels compared to the surrounding sensitive receptors. No significant impacts to noise were identified in the Draft EIR.

L110-A-64 As shown in Table 39 of the Draft EIR, the Project operation would result in an increase in noise above ambient levels. However, the potential increase in noise levels are below the applicable thresholds of significance and is considered less than significant pursuant with CEQA.

L110-A-65 As discussed in Sections 4.10.4.3 and 4.10.4.4 of the Draft EIR, the Project does not include substantial sources of vibration. The engine enclosures will be constructed in accordance with all applicable design requirements including insulation or other materials to reduce sound levels to those at or below the conservative estimates used in the Draft EIR to evaluate potential noise impacts of the Project.

L110-A-66 The comment is an opinion that the Draft EIRs definitions of "the existing roadway system" and "the vicinity" are too restrictive and underestimate the Projects impacts on transportation. The commenter does not provide any justification for perceived impact underestimates or evidence that the Project's transportation impacts are underestimated. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-67 Please refer to Topical Responses No. 1 and 8.

L110-A-68 Existing vehicular emissions are part of the baseline air quality conditions utilized in the Draft EIR. Please also refer to Topical Responses No. 1 and 8.

L110-A-69 Please refer to Topical Response No. 8.

L110-A-70 As discussed in Section 4.11 of the Draft EIR, the increase in Project-related construction traffic would not exceed the applicable thresholds of significance and would be less than significant. This was a conservative analysis as it assumed all Project-construction trips would occur during peak hours. The existing traffic conditions utilized in the traffic modeling were collected during peak hours and therefore consider existing traffic such as those associated with active landfill operations. Project operation would not result in increasing vehicle trips substantially beyond those that already occur at the site for LFG collection and flaring operations. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

Please also refer to Section 4.11.4.3 of the Draft EIR that demonstrates the Project would have a less than significant transportation and traffic impact.

L110-A-71 The comment is speculative and provides no evidence of where the garbage and construction trucks are going or coming from. Please refer to Topical Response No. 8, Section 4.11.4.3 of the Draft EIR, and Response L110-3.

L110-A-72 Please refer to Topical Response No. 8.

L110-A-73 Please refer to Topical Responses No. 8 and 9.

L110-A-74 The Project has been designed to meet applicable storm water and/or wastewater discharge limits. The permits for such discharges include monitoring and reporting conditions with which that the City would be required to comply with. The 3,500-foot-long natural gas pipeline is not included in Section 4.13 of the Draft EIR because it is a component of the Project that is evaluated in numerous other resource-specific sections of the Draft EIR including but not limited to Sections 4.1 (Air Quality), 4.2 (Biological Resources), 4.7 (Hazards and Hazardous Materials), and 4.14 (Wildfire). Section 4.13 has been revised to provide a reference to other sections of the EIR that analyze potential environmental impacts from construction and operation of the natural gas pipeline. The natural gas pipeline is proposed to be installed above ground except under road crossings to address potential landfill settlement and potential damage to the pipeline integrity.

L110-A-75 Please refer to Topical Response No. 9.

L110-A-76 Please refer to Topical Responses No. 6 and 9.

L110-A-77 The Project's dispersion analysis of airborne pollutants considered meteorological conditions recommended by the SCAQMD for the Project area. The commenter states that high wind speeds could affect fire suppression. Please also refer to Topical Response No. 9. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-78 The Project would be required to adhere to the City of Glendale's Fire Code, including vegetation clearance requirements. The Project does not include weed abatement or brush clearance beyond the proposed project facilities and is not part of a larger weed or vegetation management program. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-79 Please refer to Topical Responses No. 8 and 9.

L110-A-80 Please refer to Topical Responses No. 8 and 9.

L110-A-81 Please refer to Response L110-A-78.

L110-A-82 Please refer to Topical Responses No. 6, 7, and 9.

L110-A-83 Glendale Fire Department Station 23 is located approximately 1.45 miles north of the Project site. There is also a Los Angeles Fire Department station located approximately 1.4 miles south of the Project site. The City of Glendale has mutual aid agreements for fire response with surrounding municipalities including the Cities of Los Angeles and Pasadena. This mutual aid agreement would apply to a fire at the Project site. Please refer to Topical Response 9.

L110-A-84 The comment states that stringent fuel modification ordinances have not been enforced. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-85 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-86 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-87 Please refer to Topical Response No. 9.

L110-A-88 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 7.

L110-A-89 Please refer to Topical Response No. 7.

L110-A-90 Please refer to Response L110-13.

L110-A-91 Please refer to Response L110-13.

L110-A-92 Please refer to Response L110-13.

L110-A-93 Table 55 is accurate in demonstrating that the No Project Alternative would have higher greenhouse gas emission impacts compared to the proposed Project. This is a result of both the No Project and the proposed Project combusting the same volume of LFG. However, the proposed Project would combust the LFG in cleaner more efficient internal combustion engines, and further, because the Project would generate renewable

electricity, the City's reliance on and use of electricity generated from non-renewable sources would be commensurately reduced, which reduces the volume of GHGs compared to combustion in the flares that provides no renewable energy/greenhouse gas emissions benefit. Section 4.6 provides data on baseline flare emissions. Please also refer to Topical Response No. 10.

L110-A-94 Please refer to Response L110-13.

L110-A-95 Please refer to Response L110-13.

L110-A-96 Please refer to Response L110-13. Construction and operation phases of the proposed Project would not overlap. Applicable construction and operation phase thresholds of significance were used in the EIR to determine potential significance of proposed Project impacts as well as those from evaluated alternatives.

L110-A-97 Alternative 2 considers gas treatment at Scholl Canyon Landfill. Grayson Power Plant does not have adequate space available for a gas treatment and RNG production facility. Please also refer to Topical Response No. 10.

L110-A-98 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-99 Alternative 2 would have greater potential geology and soils impacts due to the increased grading and land development size required for Alternative 2 compared to the proposed Project. The commenter does not provide sufficient specifics related to their concerns to support their conclusions about the alternative evaluation in the Draft EIR and does not raise an environmental question. Please also refer to Topical Responses No. 7, 9, and 10. Alternative 3 would have greater transportation impacts than the proposed Project as described in Section 5.6.3.2 of the Draft EIR. Table 55 of the Draft EIR that indicates "similar" transportation impacts to the proposed Project has been corrected to "greater" in the EIR errata. As noted in Section 5.6.4.2 of the Draft EIR, while the geologic conditions vary between the two sites, both Alternative 4 and the proposed Project would be designed in accordance with applicable building code requirements that take into account site-specific geologic conditions, seismic safety design, and soil settlement considerations. Alternative 4 and the proposed Project would incorporate similar construction stormwater best management practices and stormwater/industrial drainage facilities/requirements during operation. Additionally, the size and scale of Alternative 4 and the proposed Project would be equivalent. Therefore, potential geology and soils and water quality impacts of Alternative 4 and the proposed Project were determined to be similar.

L110-A-100 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-A-101 Please refer to Topical Response No. 5.

L110-B-1 This comment introduces the attached comment letter, provided by Soil Water Air Protection Enterprise (SWAPE) to the Glenoaks Canyon Homeowners Association. The comment lists the alternatives analyzed in the Draft EIR.

L110-B-2 Please refer to Response L110-13.

L110-B-3 Please refer to Response L110-13.

L110-B-4 The comment expresses support of Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L110-B-5 Please refer to Topical Response No. 1.

L110-B-6 Please refer to Topical Responses No. 5 and 10.

L110-B-7 Reciprocating internal combustion engines were selected for the proposed Project due to their ability to operate on low methane content fuels such as LFG. Turbines were not selected as the generation technology due to their inability to operate on LFG without higher percentages of natural gas supplements. Please refer to Topical Responses No. 5.

L110-B-8 The comment expresses support of Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 10.

L110-B-9 Please refer to Topical Responses No. 1, 5, and 7.

L110-B-10 Please refer to Topical Response No. 1.

L110-B-11 The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L111 - Responses to Comments from Kelly, Robert, Graham and Gabriel Scherer, received September 28, 2020

L111-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or

CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L111-2 Please refer to Topical Response No. 9.

L111-3 Please refer to Topical Response No. 5.

L111-4 Please refer to Topical Responses No. 6, 7, and 9.

L111-5 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L111-6 Please refer to Topical Response No. 1.

L112 - Responses to Comments from Liz Amsden, received September 28, 2020

L112-1 The commenter expresses their support of the No Project alternative. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L112-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 10.

L112-3 Please refer to Topical Response No. 1.

L112-4 LFG is a naturally occurring by-product of the waste decomposition process at landfills. Additionally, please refer to Topical Response No. 1.

L112-5 Please refer to Topical Responses No. 1 and 5.

L112-6 South Coast Air Quality Management District (SCAQMD) and federal regulations mandate that LFG must either be flared or captured and converted to energy. The flaring of LFG at Scholl Canyon Landfill is permitted under existing SCAQMD permits. Flaring destroys harmful greenhouse gases, such as methane, that are a natural by-product of the landfill decomposition process, however, the energy produced from such burning is being lost. The Project will capture that the LFG and put it to beneficial use as an energy source that qualifies for the City's renewable portfolio standard.

L112-7 The life of the Project is anticipated to be 20 years, or as long as the LFG can be used to generate electricity; after which time equipment and equipment foundations would be removed. Any remaining LFG that is continued to be produced at the landfill after the life of the proposed Project would be managed through a reasonably foreseeable future action that cannot be predicted with reasonable certainty and is therefore excluded from the scope of the Project's Draft EIR. Please also refer to Topical Response No. 1.

L112-8 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L112-9 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L112-10 Please refer to Topical Response No. 8. The Project does not alter the existing access to the Scholl Canyon Landfill.

L112-11 Please refer to Topical Responses No. 1 and 5. The commenter has presented no evidence to support the statement that particular or other airborne pollutants are associated with the Scholl Canyon Landfill or the Project.

L112-12 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.

L112-13 Please refer to Topical Responses No. 6, 7, and 9.

L112-14 The comment is a general statement about the commenter's opinion of (or preference about) the Project. Commenter references "'an original agreement' with LA County that the right to use the property was for 17 years or until it has served its purpose, whichever first occurs." The reference is to a 1961 agreement, which was superseded by the 1997 JPA. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.

L112-15 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or

CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 1 and 5.

L112-16 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.

L112-17 Please refer to Topical Response No. 1.

L112-18 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.

L112-19 Please refer to Topical Responses No. 4 and 5.

L112-20 Please refer to Topical Responses No. 3, 5, and 8.

L112-21 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L112-22 Please refer to Topical Responses No. 6, 7, and 9.

L112-23 Please refer to Topical Response No. 5. The Project's emissions of GHGs are below the SCAQMD thresholds of significance.

L112-24 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 7.

L112-25 The CEQA Guidelines specify that reliance on compliance with a regulatory permit or similar process is sufficient mitigation if compliance with such standards can be reasonably expected, based on substantial evidence, to reduce the impact to the specified performance standard. 14 Cal Code Regs §15126.4(a)(1)(B). Compliance with relevant regulatory standards can provide a basis for determining that the project will not have a significant environmental impact. *Tracy First v City of Tracy* (2009) 177 CA4th

912. See *Oakland Heritage Alliance v City of Oakland* (2011) 195 CA4th 884, 906, "a condition requiring compliance with regulations is a common and reasonable mitigation measure and may be proper where it is reasonable to expect compliance." The court upheld the city's reliance on standards in the building code and city building ordinances to mitigate seismic impacts. A long line of court cases has upheld compliance with regulatory standards as adequate mitigation. See, e.g., *King & Gardiner Farms, LLC v County of Kern* (2020) 45 CA5th 814, 860 (compliance with applicable standards for treatment of water for agricultural use); *Center for Biological Diversity v Department of Fish & Wildlife* (2015) 234 CA4th 214, 245 (compliance with federal regulations for hatchery genetic management plan is reasonable mitigation measure); *Citizens Opposing a Dangerous Env't v County of Kern* (2014) 228 CA4th 360, 383 (compliance with Federal Aviation Administration procedures held to be appropriate mitigation for aviation safety impacts); *Leonoff v Monterey County Bd. of Supervisors* (1990) 222 CA3d 1337, 1355 (upholding mitigated negative declaration that included requirement that project comply with environmental laws on registering hazardous materials and monitoring underground tanks for leaks); *Sundstrom v County of Mendocino* (1988) 202 CA3d 296, 308 (upholding measures in mitigated negative declaration requiring compliance with air and water quality standards); *Perley v Board of Supervisors* (1982) 137 CA3d 424 (upholding mitigated negative declaration that included compliance with requirements of various environmental agencies among its mitigation measures).

L112-26 The City would construct and operate the Project in compliance with all applicable regulation, including, but not limited to those related to hazardous materials and waste disposal. See Response L112-25 and Topical Response 7.

L112-27 Please refer to Topical Responses No. 6, 7, and 9.

L112-28 Please refer to Topical Response No. 8 and Response to L117 below. Please also refer to Section 4.3.4 of the Draft EIR for an analysis of Project impacts to Biological Resources, including wildlife.

L112-29 Please refer to Topical Responses No. 7 and 9.

L112-30 The commenter stresses the comments made throughout the letter and reiterates their support for the No Project alternative. Please refer to Topical Responses No. 1, 4, 5, 6, 7, and 8.

L112-31 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L113 - Responses to Comments from Mary Fischer, received September 28, 2020

L113-1 The comment is a general statement about the commenter's opinions of (or preference about) the Project. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. The commenter attached an article from www.citywatchla.com titled, *In the Plus Column of Huizar's Legacy*, written by Liz Amsden. The comments reflected in the article are also stated in the comment letter received from Liz Amsden on September 28, 2020. Therefore, please refer to responses to comments of L112 from Liz Amsden, received September 28, 2020.

L114 - Responses to Comments from Rona Compton, received September 28, 2020

L114-1 The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate power. Please also refer to Topical Responses No. 5, 7, and 9.

L115 - Responses to Comments from Tobin Wills, received September 28, 2020

L115-1 The commenter expresses concern over the location of the proposed Project stating the opinion that it is too close to residences. The Scholl Canyon Landfill naturally produces methane and the SCAQMD requires the City to collect and control LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in flares at the Scholl Canyon Landfill pursuant to a permit from the SCAQMD. Rather than continuing to flare the LFG, the proposed Project seeks to capture the LFG and beneficially use the energy produced from combustion of the LFG to generate power which will assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced from the landfill decomposition process for many years and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation.

L115-2 Please refer to Topical Responses No. 4 through 9.

L115-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making.

L116 - Responses to Comments from Audry Zarokian, received September 29, 2020

L116-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L116-2 Please refer to Topical Responses No. 6, 7, and 9.

L116-3 Please refer to Topical Response No. 5.

L116-4 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. Please also refer to Topical Responses No. 5 and 10.

L116-5 Please refer to Topical Response No. 5.

L116-6 The comment is a general statement about the commenter's opinion of (or preference about) the Project. Please refer to Topical Response No. 5.

L116-7 Please refer to Topical Response No. 5.

L116-8 Please refer to Topical Responses No. 6, 7, and 9.

L116-9 Please refer to Topical Response No. 1.

L117 - Responses to Comments from California Department of Fish and Wildlife (CDFW), received September 29, 2020

L117-1 The comment is a general statement acknowledging the commenter's review the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L117-2 The comment is a general statement noting the commenter's role as a California Trustee Agency for fish and wildlife resources and their responsibility in the CEQA review process. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L117-3 The comment is a general statement noting the commenter's understanding of the Project components and location. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with

CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L117-4 The commenter is providing comments and recommendations to assist the City in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L117-5 The commenter describes concerns regarding the timing of botanical surveys conducted within the Project's BSA, recommends focused floristic surveys, recommends species specific mitigation measures, and provides guidance on suggestions on reporting. The City shall conduct focused floristic surveys prior to construction. Mitigation measure BIO-4 has been updated to include focused and appropriately timed floristic surveys the spring before construction is set to commence; this also includes preparation of a floristic survey report. The measure as currently written requires the avoidance of both State and/or federally listed plants with the appropriate agencies notified if any are sensitive floristic species are observed. Additional text has also been added to address CRPR species. Please refer to Response L117-11 for the updated measure. In response to recommended Mitigation Measure #4, the City will adopt a Mitigation Monitoring and Reporting Program for the Project that addresses "take authorization" under the CESA, addresses early consultation, and contains sufficient detail to satisfy CESA ITP requirements. With respect to Recommendation #1, BIO-4 has been updated to address the commenter's concerns. With respect to Recommendation #2, numerous surveys were conducted and rare plants were not observed. The City will conduct additional rare plant surveys prior to construction pursuant with CDFW's recommendation. Based on the extent of survey results conducted to date there is no map or table showing locations of rare plants that could be impacted because no such rare plants were observed and therefore, no species-specific measures for on-site mitigation are required. With respect to Recommendation #3, the City does not propose transplanting or salvaging rare plants within the Project impact area as no rare plants have been detected. With respect to Recommendation 4, the City will complete and submit CNDDB forms for any special-status species observed during pre-construction surveys.

L117-6 The commenter references measures and information from the Draft EIR regarding activities near and permit requirements for impacting jurisdictional aquatic features, notes concern about missing aquatic feature information on Figure 3 in the BRTR, recommends the preparation of a hydrology study, and the addition of mitigation measure text regarding permit requirements.

All of the National Wetlands Inventory (NWI) aquatic features noted in the Draft EIR, while occurring in the Biological Study Area (BSA), do not occur in any of the proposed

Project impact areas. The Project site is situated at an elevation higher than the noted features and these features would not be impacted by the Project. The concrete lined channels, that may be CDFW jurisdictional waters, are not expected to be impacted because the Project has been designed such that all gas and water pipelines would be installed over or below all potentially jurisdictional features. It is noted that the 0.13 acre freshwater pond occurring in the southeastern extent of the BSA was not described in the Draft EIR; the EIR errata identifies this feature within the BSA.

Construction of the Project is not expected to result in the discharge of sediment and fill, increased erosion and sediment transport, or the degradation of water quality that would impact headwater streams and downstream waterbodies because all the pipelines are proposed above ground which will result in minimal ground disturbing activities. The Project will be constructed almost entirely within a previously disturbed area. While some grading will be required for the water tank installation, the Project will be subject to general construction Best Management Practices (BMPs) that will require measures be in place to prevent erosion and sediment transport from all construction areas.

Because measures would be in-place to prevent erosion and sediment transport, and because there would be no direct impacts to jurisdictional aquatic features, a hydrology study is not proposed as part of the Project. The City will provide an additional figure in the FEIR that shows the NWI mapped features that occur within the BSA. Based on the proposed Project design there would be no impacts to CDFW jurisdictional waters, and as such, an application for a Lake and Streambed Alteration Agreement (LSAA) is not required for Project construction or operation. Because obtaining a LSAA is not required for the Project, a mitigation measure to ensure compliance with a regulatory standard not applicable to the Project is not required. With respect to Mitigation Measures #1 and #2 and Recommendation #1, the reasons why the recommended mitigations are not necessary is set forth herein above in this Response L117-6.

L117-7 The commenter provides information in impacts related to habitats within proposed Project area, discusses the pros and cons of habitat restoration, recommends a higher compensation ratio for permanent impacts to native vegetation communities, requests that permanent and temporary impact areas be symbolized on a figure, questions the reported percentage of native habitat impacted, recommends removing references to wetlands or riparian habitat as they do not exist in the BSA, and suggests removing the reference to off-site creation or enhancement of California sycamore woodlands and southern riparian scrub and updating to reflect the laurel sumac scrub and California sagebrush-California buckwheat scrub that occurs in the Project areas.

The Project EIR discloses that the Project will result in impacts to native vegetation communities. Both laurel sumac scrub and California sagebrush-California buckwheat scrub have a Global Rank of G4 and a State Rank of S4 and are not considered rare. S1-S3 rank are generally evaluated under CEQA, as are any locally protected species. In response to the comment, BIO-7 in the Draft EIR (now Mitigation Measure BIO-8 in the

Final EIR) has been updated to require a 3:1 mitigation ratio (up from the recommended 2:1 in the Draft EIR) for permanent impacts to all native communities for on or off-site restoration/creation and will include the recommended 2:1 ratio for participation in a mitigation bank program; the ratio for temporary impacts will remain at 1:1. The text regarding wetlands in the measure will be removed. The revised measure is presented below. Please note that the exact mitigation edits requested by the Commenter to BIO-~~7~~8 were not adopted verbatim because different mitigation standards are required for temporary and permeant impacts, however, the total acreage impacted is accurate. With respect to Mitigation Measure #3 and #4, the commenter's concerns are addressed in the edits below.

BIO-~~7~~8 Vegetation Removal and Replacement

Construction activities shall be done in such a manner as to minimize the removal of native vegetation. If impacts to native vegetation removal cannot be avoided, all temporarily impacted plant communities shall be restored on-site at a mitigation ratio of 1:1; the Project will temporarily impact 0.16 acres of California sagebrush-California buckwheat scrub and 0.45 acres of laurel sumac scrub. The compensation for the permanent loss of habitats may be achieved either by: a) on-site habitat creation or enhancement of impacted communities with similar species compositions to those present prior to construction; b) off-site creation or enhancement of laurel sumac scrub and California sagebrush-California buckwheat scrub~~ California sycamore woodlands and southern riparian scrub~~ communities; or c) participation in an established mitigation bank program. Permanent impacts to native communities shall be restored/mitigated at a 3~~2~~:1 ratio for on or off-site habitat restoration/creation or at a 2:1 ratio for participation in an established mitigation banking program; the Project will permanently impact 0.06 acres of California sagebrush-California buckwheat scrub and 2.76 acres of laurel sumac scrub. ~~Sensitive communities, including jurisdictional wetlands, shall be restored/replaced at a mitigation ration of 2:1 for all temporary and 3:1 for all permanent impacts.~~

Prior to the start of any project related activities (including removal of native vegetation), if on or off-site mitigation is required, an ecosystem-based Habitat Mitigation and Monitoring Plan shall be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques that will guide all restoration and monitoring activities. This plan shall include, at a minimum, the following:

- Provide the total acreage of unique sensitive vegetation communities impacted, and abundance, density, and cover of each plant species and vegetation layer impacted (i.e. ground cover, forbs, subshrub, shrub, and trees).

- Provide the specific location of on- and/or off-site mitigation area(s) and a science based factual discussion as to why the mitigation area(s) is appropriate for mitigating Project-related impacts. Describe the environmental features (i.e.,

soils, slope, existing vegetation, hydrology) that would suggest the mitigation area(s) can support the vegetation and wildlife impacted by Project activities.

- Provide a vegetation survey conducted at a reference site containing the vegetation communities being mitigated, with as good or better quality habitat, to document the density, abundance, diversity, and percent cover for each species by vegetation layer.

- A schematic depicting the mitigation area.

- Proposed species list for creation/enhancement~~;~~. A plant palette shall consist of species that are diverse with respect to growing duration (annual, perennial), life form (grasses, shrubs, trees, vines), and structure (ground cover, shrubs, tree canopy) that form the vegetation alliance that is being mitigated.

- Planting/seeding methodology~~;~~ (e.g., sources of local propagules, container sizes, and seeding rates).

- Planting schedule.

- Irrigation plan.

- Weeding schedule~~;~~ and invasive plant control methods that reduces or eliminates the use of chemicals.

- Success criteria.

- Monitoring methodology and schedule~~; and~~ extended across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

- Reporting requirements.

- Prior to any Project construction and activities, the perimeter of the 3.37 acres of laurel sumac scrub and California sagebrush-California buckwheat scrub be clearly delineated by temporary stakes, flags, or other clearly identifiable system. Fencing will be accompanied by signage. During WEAP, workers will be advised not to cut, clear, pull, or trample vegetation; toss or pile debris and garbage; or otherwise impact vegetation beyond the demarcated area. Temporary fencing and signage should be maintained for the duration of the Project and removed after Project construction and activities are completed.

{End of edits to Mitigation Measure BIO-~~7~~8}

For delineation of the permanent impact boundaries within the native plant communities refer to the Response for L117-14 below for additional details. With respect to Recommendations #1 through #4, the City responds as follows. (Please note, Recommendation #4 was addressed in the edits to BIO-~~7~~8 above). The City has provided a map/figure in the FEIR that shows the extent of the temporary and permanent impact boundaries. References to creation or enhancement of California sycamore woodlands and southern riparian scrub will be removed and replaced with California sagebrush-California buckwheat scrub and laurel sumac scrub.

The commenters notations regarding the overall percentages of native habitats impacted by the Project were reviewed and the impact percentages recalculated. Overall, including temporary and permanent impacts, 50 percent of the impacts will occur within native habitats with the remaining in non-native habitats or disturbed/developed lands. This also includes the areas within 100-feet of the Project facility and water tank installation area subject to fire/brush clearance. The majority of impacts to native habitats are within this clearance zone. The numbers reported in the Draft EIR will be updated. An updated table of impacts, that better reflects the types of impact areas will be provided in the FEIR and is provided below. The table below does not include percentage of impacts as there is no CEQA threshold of significance based on percent impacts to vegetation communities.

Vegetation Community / Land Cover Type		**Total Acres in Survey Area**		**Project Impacts**				
				2019 Survey (Acres)*			**2017 Survey (Acres)**	
					Perm			
2019 Survey	**2017 Survey**	**2019 Survey (Acres)**	**2017 Survey (Acres)**	**Temp**	**Power Plant, Water Tanks, and Pipeline**	**Fire/Brush Clearance**	**Temp**	**Perm**
Annual Brome Grassland	--	10.48	--	0.22	0.15	0.65	--	--
Black Sage Scrub	California Encelia-Black Sage Scrub	8.0	5.67	--	--		--	--
California Buckwheat Scrub	--	1.75	--	--	--		--	--
California Sagebrush Scrub	California Sagebrush Scrub	0.44	0.31	--	--		--	--
California Sagebrush-California Buckwheat Scrub	California Buckwheat Scrub	2.84	7.11	--	0.16	0.06	0.02	0.29
Chamise chaparral	Scrub Oak - Chamise Chaparral	4.82	2.40	--	--		--	--
Coast live oak woodland	Coast live oak woodland	2.95	1.3	-	--		--	--

Vegetation Community / Land Cover Type		Total Acres in Survey Area		Project Impacts				
Fountain Grass Swards	--	14.49	--	0.34	0.03		--	--
Laurel Sumac Scrub	Lauren Sumac Chamise Scrub	70.57	50	0.16	0.45	2.76	0.09	0.39
Developed / Disturbed	Cleared / Developed	87.16	86.75	0.91	1.39	2.33	1.13	1.45
Ornamental Woodland	Ornamental/ Non- Native	31.75	39.14	0.42	0.05		0.92	0.06
	Total	**235.25**	**192.68**	**2.06**	**2.22**	**5.80**	**2.16**	**2.19**

*These acreages include impacts related to updated Fire Department brush clearance requirements not required as part of the 2017 impact acreage calculations.

L117-8 The commenter states that they have concerns about Project impacts to trees and/or their root zones specifically note concerns regarding oak trees. The gas and water pipelines occur adjacent to areas mapped as Oak Woodlands along a section of the gas pipeline in the southern portion of the BSA. Both the gas and water pipelines will be installed above ground with footings that will not require trenching or excavation. Therefore, the Project will not directly impact trees or associated root zones within Oak Woodland habitats; this applies to locations where the pipelines occur within areas mapped as Ornamental Woodlands. The Project will be required to adhere to all applicable regulatory requirements, including the City of Glendale's Indigenous Tree Protection Ordinance (Chapter 12.44 of the GMC).

L117-9 The commenter states they are concerned that Project related impacts to Crotch bumble bee (*Bombus crotchii*) may be significant and additional surveys are required. Ground disturbance in the form of grading is only required as part of the Project's new facilities and water tank installation areas. The vast majority of these areas are already disturbed; the water tank installation area occurs in a predominantly undisturbed area with native vegetation. Given the fact that the pipelines are being installed above ground, ground disturbing activities related to the pipelines will be limited to footing installation. There has been no documented occurrence within the Project vicinity in more than 20 years and the commenter has provided no substantial evidence to support imposition of the recommend mitigation measure.

L117-10 The commenter states that they are concerned that protocol surveys for coastal California gnatcatcher (*Polioptila californica californica*) were not conducted and that the provided avoidance, minimization, and mitigation measures are inadequate for this species. As detailed in mitigation measure BIO-5 pre-construction surveys for nesting and breeding birds will be conducted prior to the start of construction activities. As noted in the Response L117-12 additional text will be included as part of this measure to require that vegetation removal take place outside the recognized nesting season. The City understands that this species, while preferring coastal sage scrub habitats, may

utilize other vegetation communities. Per the requirements of BIO-5 a minimum of a 300-foot buffer would be implemented if a nest were to be found during construction activities. For some species, such as coastal California gnatcatcher, should they be present, a larger buffer may be implemented. If a no activity buffer for this or other species extends into a construction area those activities would be postponed until the young fledge the nest or the nest fails (due to natural conditions). With these measures in place, the City does not propose to complete protocol surveys for this species.

L117-11 The commenter recommends additional language be added to existing mitigation measures to provide additional specificity to survey methods, relocation efforts, and protection measures for non-listed special-status wildlife species; they also suggest adding species specific measures. It is not necessary to add new mitigation measures in response to these comments because much of the suggested text has been incorporated into existing mitigation measures to provide additional specificity. See below for updated mitigation measures. Some of the proposed language from the commenter is already included in proposed measures below as they appeared in the Draft EIR.

BIO-1: Implement a Worker Environmental Awareness Program.

Prior to any Project activities on the site (i.e., surveying, mobilization, fencing, grading, or construction), a Worker Environmental Awareness Program (WEAP) shall be prepared and implemented by a qualified biologist(s). The WEAP shall be finalized and administered prior to construction mobilization, and implemented throughout the duration of the construction activities, such as when new contractor employees or subcontractors begin working on-site.

- The WEAP shall include, at a minimum, the following items:
    - Training materials and briefings shall include but not be limited to: a discussion of the federal and state Endangered Species Acts, Bald and Golden Eagle Protection Act, and the Migratory Bird Treaty Act; the consequences of non-compliance with these acts; identification and values of plant and wildlife species and significant natural plant community habitats; hazardous substance spill prevention and containment measures; a contact person and phone number in the event wildlife needs to be relocated or dead or injured wildlife is discovered; and a review of mitigation requirements.
        - A discussion of measures to be implemented for avoidance of the sensitive resources discussed above and the identification of an onsite contact in the event of the discovery of sensitive species on the site; this shall include a discussion on microtrash.
        - Protocols to be followed when roadkill is encountered in the work area or along access roads and the identification of an onsite representative to whom the roadkill will be reported. Roadkill shall be reported to the appropriate local animal control agency within 24 hours.

  - Maps showing the known locations of special-status wildlife, populations of rare plants and sensitive vegetation communities, seasonal depressions and known waterbodies, wetland habitat, exclusion areas, and other construction limitations (e.g. limited operating periods, etc.). These features shall be included on the proposed Project plans and specifications drawings.
  - Literature and photographs or illustrations of potentially occurring special-status plant and/or wildlife species shall be provided to all Project contractors and heavy equipment operators.

- Evidence that all onsite construction and security personnel have completed the WEAP prior to the start of site mobilization. A special hardhat sticker or wallet size card shall be issued to all personnel completing the training, which shall be carried with the trained personnel at all times while on the proposed Project site. All new personnel shall receive this training and may work in the field for no more than five days without participating in the WEAP, accompanied by staff that has undergone the training. A log of all personnel who have completed the WEAP training shall be kept on-site.
- The contract specification books shall include all project conditions as they relate to biological resources and shall be kept on-site at all times (e.g., in the break room, construction foreman's vehicle, construction trailer, etc.) for the duration of the construction. This information shall be easily accessible for personnel in all active work areas.
- Develop a standalone version of the WEAP, that covers all previously discussed items above, and that can be used as a reference for maintenance personnel during Project operations.
- An environmental monitor shall be retained during construction of the proposed project and shall be directly involved with the implementation and enforcement of the WEAP. A log of all personnel who have completed the WEAP training shall be kept on-site.

BIO-3 Implement Biological Construction Monitoring

Prior to the commencement of ground disturbance or site mobilization activities, the City of Glendale shall retain a qualified biologist(s) to monitor Project construction. The biologist will have demonstrated expertise with special- status plants, terrestrial mammals, reptiles, and birds; the qualified biologist shall have or must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities. Monitoring will occur continuously during initial ground disturbance for the duration of Project construction activities. Once initial ground disturbance is complete, monitoring will occur periodically during all construction activities within these areas. Activities related to the installation of the gas and water pipelines should be monitored daily for the duration of construction (not just initial ground disturbance). The qualified biologist(s) shall also be present at all times during ground-disturbing activities immediately adjacent to, or within, habitat that supports populations of listed or special- status species. Any special-status plants shall

be flagged for avoidance. Any special-status terrestrial species found within a Project impact area shall be relocated by the authorized biologist to suitable habitat outside the impact area; relocation will be guided by the species specific list (or plan) as described further below in this measure. Surveys for special-status species shall be conducted by the authorized biologist prior to the initiation of construction each day prior to Project construction activities ~~during initial ground disturbance, and weekly thereafter~~. Pre-construction clearance surveys should be conducted within the entirety of Project site. If nesting birds are found during the pre-construction surveys, buffers shall be installed as prescribed in Mitigation Measure BIO-5 Conduct Pre-construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures discussed below.

If, during construction, the biological monitor observes a dead or injured special-status wildlife species on the construction-site; the City of Glendale, CDFW, and USFWS (as appropriate) should be notified by the end of the work day or the following morning if the required agency office is closed. A written report shall be sent to the City of Glendale, CDFW, and USFWS (as appropriate) within ~~five~~ three (3) calendar days. The report will include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Injured animals will be taken immediately to the nearest appropriate veterinary or wildlife rehabilitation facility. The biological monitor shall, immediately upon finding the remains or injured animal, coordinate with the onsite construction foreman to discuss the events that caused the mortality or injury, if known, and implement measures to prevent future incidents. Details of these measures shall be included with the report. Work in the immediate area may only resume once the proper notifications have been made and additional measures have been identified to prevent additional injury or death. Species remains shall be collected and frozen as soon as possible, and CDFW and USFWS, as appropriate, shall be contacted regarding ultimate disposal of the remains.

A qualified biologist should prepare a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas. The list (or plan) of protocols should be implemented during Project construction and activities/biological construction monitoring. The qualified biologist, in coordination or on behalf of the City, may consult with CDFW to prepare species-specific protocols for proper handling and relocation procedures.

BIO-4 Conduct Pre-construction Floristic Plant Surveys

The City shall conduct two appropriately timed floristic surveys, following current CDFW and CNPS protocols, within the Project impact areas and within a 100-foot buffer in the spring/summer prior to the start of construction. Upon completion of the surveys a detailed report will be prepared and provided to the USFWS and/or CDFW for review; all occurrences of special-status species will be flagged in the field and GPS coordinates obtained for each individual or population.

Prior to the start of construction activities (including vegetation removal) a qualified biologist(s) will conduct pre-construction surveys for state and federally Threatened, Endangered, Proposed, Petitioned, Candidate, and Special-status Plants and Avoid Any Located Occurrences of Listed Plants or Perform other Conservation Strategy. The City of Glendale shall conduct focused surveys for federal- and state-listed and other special-status plants. All special-status plant species (including listed threatened or endangered species, and all CRPR 1A, 1B, 2, 3, and 4 species) subject to disturbance shall be documented in a pre-construction survey report. Surveys shall be conducted during the appropriate season in all suitable habitat located within the proposed Project disturbance areas and within 100 feet of disturbance areas and access roads and be conducted by a qualified botanist. The field surveys and reporting must conform to current CDFW botanical field survey protocols (CDFW, 2009) or more recent updates, if available. The report will describe any conditions that may have prevented target species from being located or identified, even if they are present as dormant seed or below-ground rootstock (e.g., poor rainfall, recent grazing, or wildfire).

If federally or state-listed and/or CRPR 1 or 2 plants are detected in disturbance areas or within 100-feet of the disturbance areas, the City of Glendale would avoid these populations and notify the USFWS and CDFW as appropriate.

The City of Glendale shall avoid impacts to any state or federally listed plants to the extent feasible. If Project activities result in the loss of more than 10 percent of the known individuals within a special-status plant species (List 3~~1.B~~ and List 4~~2~~ only) occurrence/population to be impacted, the City of Glendale shall consult with USFWS and CDFW regarding the most appropriate conservation strategy for the particular species being impacted.

BIO-6 Conduct Surveys for Terrestrial Herpetofauna and Implement Monitoring, Avoidance, and Minimization Measures

Prior to ground disturbance or vegetation clearing at all Project locations, the City of Glendale shall retain a qualified biologist to conduct surveys for terrestrial herpetofauna where suitable habitat is present and directly impacted by construction vehicle access. Surveys should place an emphasis towards identifying any Species of Special Concern (SSC) including (but not limited to) the southern California legless lizard; California glossy snake; coastal whiptail; coast horned lizard; and San Diego desert woodrat. Focused surveys shall consist of a minimum of three daytime surveys and one nighttime survey within one week of vegetation clearing. The qualified biologist will be present full time during all vegetation removal activities immediately adjacent to or within habitat that supports terrestrial herpetofauna, and part time for all remaining activities. Surveys for terrestrial herpetofauna shall be conducted by the qualified biologist prior to the initiation of each day of vegetation removal activities in suitable habitat. Terrestrial herpetofauna found within the area of disturbance or potentially affected by the proposed Project will be relocated to the nearest suitable habitat that will not be affected by the proposed Project.

L117-12 The commenter recommends adding language to BIO-5 that prohibits construction activities from Jan 1 through Aug 31 to fully avoid impacts to nesting birds. BIO-5 currently provides for surveys and the implementation of no work activity buffers during construction. Given the duration of Project construction (15-18 months) it will not be feasible to complete all construction work outside of the nesting season. Additional text was included in BIO-5 that requires all initial vegetation removal activities to be conducted outside of the recognized nesting season to prevent direct impacts to nesting birds. Text was also included that recommends construction activities resulting in a significant increase in noise or dust, based on baseline levels, to be conducted outside of the nesting season to the extent feasible.

Pre-construction surveys (BIO-5) and biological monitoring (BIO-3) for activities during the nesting season will require the implementation of an initial 300-foot buffer (500 feet for raptors) around active nests and no activities will be allowed within the buffers until the young have fledged from the nest or the nest fails. The prescribed buffers may only be adjusted by a qualified avian biologist in coordination with the USFWS and/or CDFW based on existing conditions around the nest, planned construction activities, tolerance of the species, and other pertinent factors.

L117-13 The commenter brought up concerns related to impacts of the Project on special status bat species and recommends additional surveys and mitigation measures. The Biological Resources Technical Report prepared for the Project did assess the potential for special-status bat species to occur in the BSA. All but one species, western mastiff bat (*Eumops perotis californicus*), was determined to have a low potential of occurrence due to habitat suitability and known occurrences in the region; western mastiff bat was determined to have a moderate potential for occurrence.

The gas and water pipelines will be constructed such that they can avoid the need to remove native or non-native trees that could support bat species. There are several non-native pepper trees along the southern edge of the proposed Project site that may require removal; Project construction activities will avoid tree removal to the extent feasible. At a minimum there will be construction activities within the general vicinity of trees that may have potential to support bat species. Therefore, the additional measures below will be incorporated into the FEIR to mitigate for potential direct and indirect impacts to bat species.

BIO-7A Conduct pre-construction maternity colony or hibernaculum surveys for sensitive bats.

No more than 15 days prior to Project construction activities near trees, or which involve removal of trees or other structures, the City shall retain a qualified biologist who has a CDFW collection permit and a Memorandum of Understanding with CDFW allowing the biologist to handle bats. That biologist shall conduct pre-construction

surveys for sensitive bats. Surveys shall also be conducted during the maternity season (1 March to 30 September) within 100 feet of Project activities.

If active maternity roosts or hibernacula are found, the structure, tree or tower occupied by the roost shall be avoided (i.e., not removed), if feasible; work shall not occur within 100 feet of or directly under or adjacent to an active roost and work shall not occur between 30 minutes before sunset and 30 minutes after sunrise. If avoidance of the maternity roost is not feasible, the biologist shall survey (through the use of radio telemetry or other CDFW methods) for nearby alternative bat maternity colony sites. If the biologist determines in consultation with the CDFG that there are alternative roost sites used by the maternity colony and young are not present then no further action is required, and it will not be necessary to provide alternate roosting habitat. If there are no alternative roosts sites used by the maternity colony, BIO-7B is required. If no active roosts are found, then no further action is required. If active maternity roosts are absent, but a hibernaculum (i.e., a non-maternity roost) is present, then BIO-7B is not necessary, but BIO-7C is required.

BIO-7B Provide substitute roosting habitat for bats.

If a maternity roost will be impacted by the Project, and no alternative maternity roosts are in use near the site, substitute roosting habitat for the maternity colony shall be provided on, or in close proximity to, the Project site no less than three months prior to the eviction of the colony. Alternative roost sites will be constructed in accordance with the specific bat requirements in coordination with CDFW. By making the roosting habitat available prior to eviction (BIO-7C), the colony will have a better chance of finding and using the roost. Alternative roost sites must be of comparable size and proximal in location to the impacted colony. The CDFW shall also be notified of any hibernacula or active nurseries within the construction zone.

If construction of alternative roost sites is required, the biologist shall provide a written report, documenting the required coordination with CDFW as well as the location of roost sites. This report shall be provided to CDFW.

BIO-7C Exclude bats prior to eviction from roosts.

If non-breeding bat hibernacula are found (for the duration of construction activities) in structures or trees scheduled to be removed, the individuals shall be safely evicted, under the direction of a qualified biologist, by opening the roosting area to allow airflow through the cavity or other means determined appropriate by the bat biologist (e.g., installation of one-way doors). In situations requiring one-way doors, a minimum of one week shall pass after doors are installed and temperatures should be sufficiently warm for bats to exit the roost because bats do not typically leave their roost daily during winter months in southern coastal California. This action should allow all bats to leave during the course of one week. Roosts that need to be removed

in situations where, in the judgment of the qualified biologist, the use of one-way doors is not necessary shall first be disturbed by various means at the direction of the bat biologist at dusk to allow bats to escape during the darker hours, and the roost tree shall be removed or the grading shall occur the next day (i.e., there shall be no less or more than one night between initial disturbance and the grading or tree removal).

If an active maternity roost is located in an area to be impacted by the Project, and alternative roosting habitat is available, the demolition of the roost site must commence before maternity colonies form (i.e., prior to March 1st) or after young are flying (i.e., after July 31st) using the exclusion techniques described above.

L117-14 The commenter recommends the final environmental document provide a measure to protect native vegetation communities adjacent to areas of permanent impacts that may need to be routinely cleared of brush to maintain sufficient fire clearance requirements. See Topical Response No. 9. The impact acreages reported in the Draft EIR assume permanent impacts within the entirety of the fire clearance areas associated with the Project site. Mitigation Measure BIO-~~7~~8 requires compensatory mitigation for impacts to native communities. It is important to note that impacts are assumed permanent whether areas will be cleared, or vegetation is just trimmed or pruned. The City notes the recommendation for delineation of the clearance boundaries and will consider options to demarcate the outer boundaries that is wildlife friendly (e.g., wildlife friendly fencing, stakes, etc.); See updated Mitigation Measure BIO-~~7~~8 in Response 117-7.

L117-15 The commenter recommends the Project consider alternative designs to alleviate the need to grade native habitat. The Project considered multiple alternatives for locating Project components to minimize impacts to native habitats to the extent feasible. This included placing the pipelines above ground to minimize grading and placing the Project facilities within predominantly disturbed areas. The majority of native habitat related impacts are a direct result of fire clearance requirements which include a combination of vegetation removal and trimming. Please also refer to Topical Response No. 10.

L117-16 The commenter describes concerns regarding the security fencing and lighting associated with the Project and suggests using wildlife friendly fencing, use low level lighting, and to minimize or eliminate lighting from dawn until dusk. The majority of the Project occurs within previously disturbed lands within the existing landfill. The existing adjacent landfill and open space will still allow for wildlife movement through the area similar to the current site conditions. Wildlife friendly fencing is not proposed due to Project security needs. There are ample opportunities for wildlife movement around the Project site, therefore, the Project is not expected to be an impediment to wildlife movement though the area. The City will take into consideration the recommendations on low level lighting and minimized lighting from the period between dusk and dawn.

L117-17 The Project does not propose the installation of any landscaping. Any vegetation installed would be for post-construction restoration, which would include native species only.

L117-18 The comment is a general statement noting that the proposed Project would have an impact on fish and/or wildlife, and that filing fees should be assessment and be payable upon filing of the Notice of Determination by the City of Glendale to help defray the cost of environmental review by CDFW. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L117-19 The commenter states that they appreciate the opportunity to comment on the Project to assist the City of Glendale in adequately analyzing and minimizing/mitigating impacts to biological resources. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L117-A Attachment A: Draft Mitigation and Monitoring Reporting Plan (MMRP), of the CDFW comment letter, provides recommendations on specific language to be incorporated into a future environmental document for the Project. A final MMRP will reflect recommendations and results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans. Portions of the recommended measures have been incorporated into existing measures. New mitigation measures, regarding bats are included in the responses above.

L118 - Responses to Comments submitted on behalf of Glenoaks Canyon Homeowners Association (GOCHA), received September 29, 2020

L118-1 The comment is a transmittal of an attached comment letter submitted by Amy Minteer of Chatten-Brown, Carstens and Minteer, LLP, on behalf of GOCHA.

L118-2 The comment introduces GOCHA and identifies GOCHA's relationship to the Glendale community. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L118-3 Since April 2018, GWP discontinued combusting LFG in the boilers at the Grayson Power Plant. All LFG produced by the landfill since April 2018 has and is presently being combusted in the existing flare system at the Scholl Canyon Landfill. The Notice of Preparation of the Draft EIR for the Project was noticed on March 21, 2019 and correctly established baseline conditions with flaring of LFG at Scholl Canyon Landfill. Please refer to Topical Responses No. 1, 2, 5, 9, and 10. Please also refer to Response L110-15.

L118-4 Please refer to Topical Responses No. 1 and 5. The commenter has the baseline scenario reversed when the commenter states that "the EIR must identify the future use so that it can adequately address the aesthetic and recreational impacts of the Project constructing an industrial use next to a recreational area." The existing permitted use is "industrial" e.g., land fill operations which include the required and SCAQMD permitted

methane capture and combustion flaring system. The Project with be entirely constructed within the existing Scholl Canyon Landfill area and is not "next to a recreational area." While it is reasonably foreseeable based on the existing Joint Powers Agreement between the City, County and Los Angeles Sanitation District, that post-closure conversion of Scholl Canyon Landfill into a recreation area will occur, the JPA anticipates the future Scholl Canyon Landfill will include on-going required LFG capture and related facilities and roads; the Project is part of this process. It is unknown when the future closure and conversion of Scholl Canyon Landfill into a recreation area will occur, what improvements or facilities will be contained in that recreation area, and when it would be completed. Nevertheless, the City has analyzed a conservative scenario for post-closure recreational development that is anticipated by the JPA. See Topical Responses No. 5 and 8.

The commenter's statement that the Draft EIR fails to disclose that the flares for LFG would need to operate simultaneously with the Project is incorrect. Please refer to Topical Response No. 5.

L118-5 Please refer to Topical Responses No. 2 and 10. The commenter contends the City selected a narrow view of the Project which, pursuant to the two court cases cited by the commenter, the commenter believes was done as a "launching pad for a vastly wider proposal", yet the commenter does not identify what that vastly wider proposal might be; the comment is opinion not supported by facts or evidence.

With respect to the commenter's contention that the Project and the Grayson Project are interrelated and should therefore be analyzed together because both projects generate power does not connect the Projects from a CEQA perspective.

The Grayson EIR Project Description recognizes that the existing LFG pipeline (no longer in use since April 2018) physically connected the Scholl Canyon Landfill to Grayson Power Plant because LFG was previously burned at Grayson. See Topical Response No. 2 which discusses the relationship between the Grayson Repowering Project and the Biogas Project. The Commenter's reference to the currently closed and soon to be permanently decommissioned pipeline does not establish that the Grayson Repowering project and Biogas Renewable Generation Project are a single project. The Grayson Repowering Project is evaluated as a related project in the cumulative impact analysis of the Biogas Renewable Generation Project Draft EIR.

To be clear, CEQA Guidelines §15126 states that the project description must include all relevant parts of a project, including future expansion or later phases of the project that will foreseeably result from project approval. *Laurel Heights Improvement Assn. v Regents of the University of California*, (1988) 47 Cal.3d 376, establishes a two-pronged test for determining what constitutes the whole of the project. First, is whether the activities are reasonably foreseeable consequence of the initial project, and second, is whether future expansion/action will be significant (change the scope or nature of the

initial project or its environmental effect). The commenter provides no substantial evidence to support the contention that the Project is a reasonably foreseeable consequence of Grayson's repowering or that the Project is a future expansion of Grayson or of any other project. (See Topical Responses No. 1 and 2)

In *Aptos Council v County of Santa Cruz* (2017) 10 Cal.App.5th 266, 281, the court found that possible future expansion or other action related to a project that is not a reasonably foreseeable consequence of the project need not be included in an EIR's project description, especially where such activities will operate independently of one another and can be implemented separately. In that case the county approved several revisions to its zoning ordinances, but they were not considered a single project because ordinances serve different purposes, operate independently of one another, and can be implemented separately, as is the case with Grayson and the Project. See also, *Paulek v Department of Water Resources* (2014) 231 Cal.App.4th 35, 46.)

The fact is that LFG was flared at Scholl Canyon Landfill prior to SCAQMD prohibiting burning LFG at Grayson, and LFG will continue to be flared at Scholl Canyon Landfill, during Project construction or maintenance periods as a backup system to destroy methane and other LFGs. Flaring at Scholl Canyon Landfill would occur regardless of whether Grayson is repowered or the Project is built. The Project is not a reasonably foreseeable consequence of Grayson repowering since LFG flaring pre-existed the Grayson repowering project and flaring already handles the LFG produced at Scholl Canyon Landfill in accordance with an existing SCAQMD permit to operate. However, flaring does not beneficially employ the combustion process for power generation or for use in the Project or any of its feasible alternatives.

L118-6 The commenter supposition indirectly encourages expansion of the landfill is based entirely on speculation. Please refer to Topical Response No. 1.

L118-7 Please refer to Topical Response No. 5. The choice of Project baseline is not a manipulation as alleged by the Commenter. The purpose of the Project is to burn the same LFG that was previously burned at Grayson and which is currently being flared at Scholl Canyon Landfill – there is only one LFG source. Both of those baseline emission conditions (Grayson and flaring) will, for the most part except for nominal flaring) be eliminated through project implementation. The prior Project MND conservatively analyzed AQ and GHG Project impacts while LFG was burned at Grayson, and this current Project Draft EIR analyzed the Project AQ and GHG impacts while LFG was 100 percent being burned at the Scholl Canyon Landfill. The data shows that in both instances the Project AQ and GHG impacts are less than significant. It is not accurate to "add" Project AQ and GHG impacts to either the burning LFG at Grayson or flaring LFG at Scholl Canyon Landfill because not only is that factually inaccurate, because the same LFG cannot be burning at both locations at the same time. Accordingly, to do so would artificially increase, perhaps doubles the actual emissions expected to occur with Project implementation. Topical Response No. 5 includes data from the pre-April 2018

conditions, which reflects burning LFG at Grayson. However, based on the fact that the Project is designed to significantly reduce the need for flaring at Scholl Canyon Landfill and eliminates burning LFG at Grayson, whether a pre- or post-April 2018 baseline is used would not change the Project impacts on AQ or GHG emissions. Accordingly, using the NOP issuance date as the baseline is appropriate. Further, because the thresholds of significance are concentration based, using the Draft EIR baseline is also appropriate and is more conservative because the Project emissions are added to the existing elevated ambient air quality concentrations from LFG flaring emissions at Scholl Canyon Landfill. When compared to pre-April 2018 conditions (virtually no flaring at Scholl Canyon Landfill), the post-2018 conditions would more likely reflect threshold exceedances, and the data shows AQ and GHG analysis (Project plus flaring) does not exceed applicable thresholds and/or was shown not to exceed an ambient air quality standard through dispersion modeling.

L118-8 Please refer to Topical Response No. 5.

L118-9 Please refer to Topical Response No. 5.

L118-10 Please refer to Topical Response No. 5 and Response L110-13.

L118-11 Please refer to Topical Response No. 5 and Response L118-7.

L118-12 Please refer to Topical Response No. 9.

L118-13 The Project does not propose habitable structures. Vegetation clearance requirements, potential impact radius of the natural gas pipeline, and design consideration such as placing the engines in engineered enclosures with fire protection systems are facts supporting a low risk of wildfire. Please refer to Topical Responses No. 7, 8, and 9.

L118-14 Onsite access roads have been designed in accordance with and have been approved by the Glendale Fire Department. The Project does not propose or require the construction or maintenance of any offsite emergency access roadway. Please refer to Topical Responses No. 8 and 9.

L118-15 The existing overhead electrical lines are part of the baseline conditions for wildfire risk. The Project does not include the installation of new overhead electrical lines. The Project would be designed, operated, and maintained in accordance with applicable building code requirements, including seismic safety. Please refer to Topical Responses No. 6, 7, and 9.

L118-16 Please refer to Topical Response No. 6 and Response L110-A-43.

L118-17 The EIR analyzed cumulative Project impacts. See Sections 4.1.5, 4.2.5, 4.3.5, 4.4.5, 4.5.5, 4.6.5, 4.7.5, 4.8.5, 4.9.5, 4.10.5, 4.11.5, 4.12.5, 4.13.5, and 4.14.5 for the cumulative impacts analysis.

L118-18 LFG is being flared at Scholl Canyon Landfill in accordance with the conditions of an existing SCAQMD Permit to Operate, which permits full time flaring already and the permit was issued following a CEQA analysis . The LFG collection system and existing flares are part of the baseline environmental conditions considered in the Draft EIR. Please also refer to Topical Response No. 5. No new “mitigation” measures are required in order to use the existing flaring permit. Please also refer to Topical Response No. 9 and Response L118-19.

L118-19 If allowed during Project operation, smoking would be restricted to a designated smoking area within the site. The designated smoking area would be operated and maintained with applicable City and code requirements for signage and appropriate disposal receptacles. Mitigation measures would be enforced through implementation of a CEQA required Mitigation Measure Monitoring and Reporting Plan. The Project would not have a significant wildfire impacts during operation due to project design features such as placing the reciprocating internal combustion engine generators in enclosures equipped with an inert gas fire suppressions system, remote monitoring and control systems, and onsite fire water protection tank. Please refer to Topical Responses No. 6 and 9.

L118-20 The Draft EIR recognizes the Project’s location within a high fire hazard area and the meteorological conditions including high winds that contribute to the high fire hazard area designation. The Project considers these baseline conditions when evaluating potential wildfire impacts and would be required to comply with applicable fire protection code requirements applicable to high fire hazard areas. Please refer to Topical Responses No. 7 and 9.

L118-21 The comment contains generalizes statements about the adequacy of the Draft EIR’s alternatives analysis, which is contained in Section 5.0, Alternatives, of the Draft EIR. In fact, the Draft EIR analyses and considers Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. The objective of the proposed Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate power. The Project objectives are not so narrowly drawn as to preclude consideration of reasonable, feasible alternatives.

L118-22 See Response tL118-21. The comment here presupposes the Draft EIR analysis is not adequate and therefore the alternatives analysis must be revised and the Draft EIR recirculated. The comment also includes general citations to CEQA case law pertaining to alternatives and mitigation, and refers back to the SWAPE letter L-110-B. Please see Topical Response No. 5 that shows emissions of dioxins associated with the Project would not result in significant adverse health effects. The proposed LFG pre-treatment/conditioning process, high operating temperatures of the reciprocating internal

combustion engines, and emissions control system would be effective in removing and/or destroying dioxins if present in the LFG.. Please also refer to Topical Response No. 10.

L118-23 The comment asserts that the Draft EIR fails to include the necessary comparative analysis of Project Alternatives in order to allow for necessary comparison. Please refer to Section 5.6.5 of the Draft EIR for the comparative analysis of the Project Alternatives. The comment asserts that a comparative analysis of the Project is alternatives is not adequate but does not cite to any authority or show how such comparative analysis is in fact inadequate. The comment also criticizes the Draft EIR inclusion of a list of Operational or Planned LFG Projects in California and is included for informational purposes and are not themselves considered "alternatives" to the proposed Project; therefore, the information provided in the list need not be any more detail.

According to CEB's 2021 Practice Under the California Environmental Quality Act (Kostka, Zischke)(herein referred to as the "CEQA Practice Guide"), Section 15.35, "An EIR must evaluate the comparative merits of the alternatives identified in an EIR." 14 Cal Code Regs §15126.6(a). There are several methods for analyzing the alternatives in an EIR, and the courts have not favored any particular method. Most often, the analysis of the alternatives is set forth in a separate section of the EIR containing a discussion comparing the key characteristics of each alternative and the project. Sometimes the analysis includes an impact-by-impact comparison of the alternatives and the project. A discussion of alternatives may also be set forth in each topical section of the EIR rather than in a separate section.

The level of analysis of alternatives is subject to a rule of reason, as with the range of alternatives that must be discussed. *Laurel Heights Improvement Ass'n v Regents of Univ. of Cal.* (1988) 47 C3d 376, 406. The discussion need not be exhaustive and a crystal ball inquiry is not required. *Sierra Club v City of Orange* (2008) 163 CA4th 523, 547; *Foundation for San Francisco's Architectural Heritage v City & County of San Francisco* (1980) 106 CA3d 893, 910. The agency need make only an objective, good faith effort to compare the project with the alternatives. The evaluation is necessarily limited by what is realistically possible given limitations on time, energy, and funds. *Residents Ad Hoc Stadium Comm. v Board of Trustees* (1979) 89 CA3d 274, 286."

Further, Section 15.36 of the Practice Guide states, "The significant adverse environmental effects of each alternative must be discussed, *but in less detail than is required for the project's effects.* 14 Cal Code Regs §15126.6(d). *A matrix showing the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison of alternatives with the proposed project*. 14 Cal Code Regs §15126.6(d). See *Sierra Club v City of Orange* (2008) 163 CA4th 523, 547." (Emphasis added)

Accordingly, a matrix or chart which provides a summary comparison between the relative impacts of the Project and the Project Alternatives is an adequate method of

comparative analysis because it is objective, prepared in good faith, and realistic given the reasonable range of alternatives to the Project.

L118-24 See Response L118-24 above. The comment states the Draft EIR fails to provide evidentiary support for the comparative analysis of the Project and Alternatives, however, the comparison chart on pages 5.17 and 5.18 of the Draft EIR is based on the analysis of each Alternative contained in the Draft EIR, which need not be as detailed as the Project analysis; and the comment does not point out what evidence is in fact lacking. The "magnitude" of the impact reduction of an Alternative compared to the Project need not be more detailed than reflecting whether the level of impact of an Alternative is greater or lesser compared to the Project. Please also refer to Topical Response No. 10.

L118-25 The comment claims that Alternative 4 and Alternative 2 are feasible, but the Draft EIR lacks the necessary quantitative analysis to provide the public and decision makers with sufficient information. Please refer to Topical Response No. 10.

L118-26 The comment presents and opinion that the Draft EIR is fatally flawed and must be recirculated. The commenter's opinion is included for consideration by the decision makers.

L118-27 The commenter presents a list of attachments provided with their comment letter. See Topical Responses No. 1 and 5 with respect to Attachment 1 which allegedly consists of a list of the Scholl Canyon Landfill gas flow rates. This list is not attributed to any verifiable source, and therefore cannot be considered substantial evidence in support of the comment. Attachment 2 consists of the commenter's 2018 comments on an entirely separate project (See Topical Response No. 2). Attachment 3 consists of the commenter's 2017 three-page comment letter on the Biogas Project MND wherein the commenter posits an opinion that the Project be analyzed in an EIR; the City prepared an EIR for the Project, and the City has responded to the commenter's comments on the Draft EIR. Attachment 4 consists of excerpts for the Scholl Canyon Landfill Expansion Project EIR; these excerpts are not relevant to the proposed Project because the Scholl Canyon Landfill Expansion Project was not approved, was officially abandoned, and that 2014 Project EIR is outdated. (See Topical Response No. 1).

L119 - Responses to Comments from Jackie Gish, received September 29, 2020

L119-1 The comment introduces attached detailed comments on the Draft EIR.

L119-2 The comment explains the commenter's relationship to the Glendale community.

L119-3 Glenoaks Canyon Residents question the project objective, why there was no statement of picking the best project from the point of view of health and safety of the residents and environmental, additionally, comment a possibility of LFG burning may not be classified as "renewable energy" in the future.

California has established a goal of relying entirely on zero-emission energy sources for its electricity by the year 2045. The bill specifically requires that 50 percent of California's electricity to be powered by renewable resources by 2025 and 60 percent by 2030, while calling for a "bold path" toward 100 percent zero-carbon electricity by 2045. Glendale is working toward meeting these renewables requirements. The Biogas Project is one of the ways the City proposes to meet these requirements.

Section 5.6.6 (Identification of the Environmentally Superior Alternative), discusses the environmentally Superior Alternative, as required by Section 15126.6 of the State CEQA Guidelines requires that an “environmentally superior” alternative be selected among the alternatives that are evaluated in the EIR. In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts.

The Project would serve a benefit from utilizing LFG that would be otherwise wasted to generate electricity even if renewable energy regulations change in the future. Please also refer to Topical Responses No. 5, 6, and 9.

L119-4 Please refer to Topical Response No. 5.

L119-5 LFG is permitted by SCAQMD to be combusted in flares at Scholl Canyon Landfill and is considered an existing baseline condition for the Project EIR. Los Angeles County Sanitation District plans to replace the existing flares with new flares. If the Project is implemented, LFG not combusted in the reciprocating internal combustion engine generators would be combusted in the exiting flares and then the new flares once the flare replacement is completed by Los Angele County Sanitation District. The Project’s potential air quality and health impacts were conservatively analyzed in the Project’s EIR which assumed use of the existing flares which have higher emissions than the replacement flares proposed by Los Angeles County Sanitation District. Please also refer to Topical Response No. 5.

L119-6 Please refer to Response L110-11.

L119-7 Figure 2.3-3 of the EIR provides the layout of the Proposed Project. Artist’s concepts were not prepared by the City and potential impacts of the Project would be comparable regardless of adjacent landfill activity/elevation.

L119-8 Please refer to Topical Response No. 1.

L119-9 The City selected the proposed engines because they are efficient, capable of combusting the LFG to generate electricity, and the capacity/number of units is scalable as the available volume of LFG decreases over time.

L119-10 Engines are projected to run both during the day and night. The number of engine starts/stops and maintenance needs used in the EIR are conservative. The EIR analyzes

potential environmental impacts of combusting all of the LFG available. Please also refer to Topical Response No. 5.

L119-11 Please refer to Topical Response No. 5.

L119-12 The natural gas is needed to supplement combustion in the engines during engine startup and/or when LFG methane content periodically decreases as decomposition of landfill materials vary over time.

L119-13 The City selected the proposed engines because they are efficient, capable of combusting the LFG to generate electricity, and the capacity/number of units is scalable as the available volume of LFG decreases over time. Please also refer to Topical Responses No. 1 and 5.

L119-14 Any waste products would be handled, transported, and disposed of in compliance with all applicable federal, state, and local laws, regulations, and guidelines.

L119-15 Please refer to Topical Response No. 4.

L119-16 Please refer to Topical Response No. 5.

L119-17 to L119-34 The commenter reiterates similar comments (L119-17 through L119-34) previously submitted by the Glenoaks Canyon Scholl Canyon Landfill Work Group as Attachment A to comment letter L110, submitted by GOCHA on September 28, 2020. Please refer to responses to comments L110-A-7 through L110-A-101, received September 28, 2020. Please also refer to Topical Response No. 10.

L119-35 The commenter provides a summary of comments and concerns expressed throughout the comment letter. Please refer to responses to comments L119-1 through L119-34. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 10.

L119-36 Page 4.164 of the Final EIR has been revised to include the reference of "million" MWhr in regard to the City's electrical load obligation. Page 4.212 of the Draft EIR correctly references the equation for Potential Impact Radius defined in 49 CFR § 192.903 which is used by U.S. Department of Transportation, Pipeline Management and Hazardous Materials Administration for regulatory compliance related to natural gas pipeline integrity management. Please also refer to Topical Response No. 5.

L120 - Responses to Comments from Justin King, received September 29, 2020

L120-1 The comment expresses the commenter's opinion of (or preference about) the Project. Please refer to Topical Response No. 1.

L120-2 Please refer to Topical Response No. 1 and Response L92-1.

L120-3 Please refer to Topical Response No. 1.

L120-4 Please refer to Response L110-A-49.

L120-5 Specifications for secondary containment for lube oil, liquid wastes, and hazardous wastes would be confirmed during final engineering design. Containment utilized would meet appliable code requirements. Stormwater collected in secondary containment would be removed by vacuum truck or portable pump.

L120-6 Hazardous waste, if and when present, would be stored in a single accumulation site within the 2.2-acre power generation facility. The potential environmental impacts evaluated in the Draft EIR assume the waste accumulation site could be located anywhere within the 2.2-acre power generation facility.

L120-7 The lube oil and liquid wastes would be located within the 2.2-acre power generation facility. While the final location would be confirmed during final engineering design, the potential environmental impacts evaluated in the Draft EIR assume the lube oil and liquid wastes could be located anywhere within the 2.2-acre power generation facility.

L120-8 The natural gas pipeline is a proposed component of the Project and its potential environmental impacts are evaluated throughout the Draft EIR. The discussion of the natural gas pipeline and environmental impacts analysis of that pipeline has been added to Section 4.13 of the Draft EIR.

L120-9 Waste impurities removed from the condensate would be stored in a single accumulation site within the 2.2-acre power generation facility. The potential environmental impacts evaluated in the Draft EIR assume the waste accumulation site could be located anywhere within the 2.2-acre power generation facility. Please also refer to Response L120-5.

L120-10 Please refer to Responses L120-5, L120-6, L120-7, and L120-9.

L120-11 The air monitoring stations used in support of the dispersion modeling are consistent with SCAQMD guidance. No additional baseline air monitoring is proposed or required as part of the Project. Please refer to Topical Response No. 5.

L120-12 Please refer to Response L110-A-44.

L120-13 Please refer to Response L110-A-45.

L120-14 Please refer to Response L110-A-43.

L120-15 Please refer to Response L110-A-44.

L121 - Responses to Comments from Miri Hindes, received September 29, 2020

L121-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L121-2 Please refer to Topical Response No. 9.

L121-3 Please refer to Responses L110-11 and L110-15 and Topical Response No. 10.

L121-4 Please refer to Topical Response No. 1.

L121-5 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L122 - Responses to Comments from Scott Freudenberg, received September 29, 2020

L122-1 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. The Project is proposed to be located within the existing boundaries of the Scholl Canyon Landfill which naturally produces methane and other LFGs. The SCAQMD requires the City to collect and control this LFG to eliminate direct release of methane from the landfill into the atmosphere. LFG is currently being captured through an existing LFG collection system and combusted in existing flares at the Scholl Canyon Landfill pursuant to an existing SCAQMD permit. Rather than continuing to flare the LFG and lose the energy produced by the required combustion, the proposed Project seeks to capture and beneficially use the LFG for to generate electricity and thereby assist the City in meeting and exceeding State requirements for renewable energy generation. LFG will continue to be produced and must be collected and controlled regardless of whether Scholl Canyon Landfill remains in operation. Please also refer to Topical Responses No. 5, and 9.

L123 - Responses to Comments from Shanah Blevins, received September 29, 2020

L123-1 The comment expresses the commenter's opinion of (or preference about) the Project. Please refer to Topical Responses No. 5, 7, and 9.

L124 - Responses to Comments from Spencer Wright, received September 29, 2020

L124-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L124-2 Please refer to Topical Responses No. 4 through 9.

L124-3 Please refer to Topical Responses No. 1 and 10.

L124-4 SCAQMD and federal regulations mandate that LFG must either be flared or captured and converted to energy. The flaring of LFG at Scholl Canyon Landfill is permitted under existing SCAQMD permits. Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of project alternatives required for an EIR under the CEQA Guidelines and see Topical Response No. 10. The alternatives selected for analysis represent a reasonable range that meet the project objectives, reduce project impacts is some areas, and will assist in informed decision-making. Please also refer to Responses L110-11 and L110-15. The commenter's opinion of (or preference about) the Project is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L125 - Responses to Comments from Bonnie Voland, received September 30, 2020

L125-1 The commenter identifies her relationship to Glendale. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L125-2 Please refer to Topical Responses No. 5 through 9.

L125-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L126 - Responses to Comments from Chris Hulen, received September 30, 2020

L126-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L127 - Responses to Comments from East Area Progressive Democrats, received September 30, 2020

L127-1 The commenter introduces the East Area Progressive Democrats' (EAPD) letter of opposition to the Project. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L127-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. Please refer to Responses L110-11 and L110-15. The commenter's

statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. See also Topical Response No. 10.

L127-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment claims the Draft EIR is defective but does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L127-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L127-5 The Project and Draft EIR are not premised on the functionality or suitability of the existing pipeline between Scholl Canyon Landfill and Grayson Power Plant. Please refer to Section 5.6.4 of the Draft EIR for a discussion of a Project alternative that includes re-use of the existing pipeline between Scholl Canyon Landfill and Grayson Power Plant. See also Topical Responses No. 2 and 10.

L127-6 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 2.

L127-7 Please refer to Response L127-6.

L127-8 Please refer to Topical Responses No. 7 and 9.

L127-9 The comment expresses support of Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 2 and No. 10.

L127-10 Please refer to Topical Response No. 1.

L127-11 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L128 - Responses to Comments from Edmund H. Lew, received September 30, 2020

L128-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. Please also refer to Topical Response No. 5.

L128-2 The comment expresses support of Alternative 2 and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L129 - Responses to Comments from Eileen Hatrick, received September 30, 2020

L129-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L129-2 Please refer to Topical Response No. 5. Please also refer to Section 5.6.4 of the Draft EIR for a discussion of a Project alternative that includes re-use of the existing pipeline between Scholl Canyon Landfill and Grayson Power Plant. See also Topical Responses No. 2 and 10.

L129-3 Please refer to Response L129-2.

L129-4 Please refer to Topical Responses No. 5, 7, and 9.

L130 - Responses to Comments from Gustavo Moreno, received September 30, 2020

L130-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 5.

L130-2 The Los Angeles River, Eagle Rock Reservoir, and Hillmont Pump and Eagle Rock Chlorination Station are located approximately 4.25 miles southwest, ½ mile south, and 0.6-mile south of the Project site, respectively. The comment does not specify a specific water quality concern with respect to these features relevant to the Project's potential environmental impacts pursuant with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L130-3 In March 2020, as part of a series of emergency measures in response to the COVID-19 pandemic, Governor Newsom signed Executive Order N-29-20, allowing local and state agencies to hold virtual meetings via teleconference and to make meetings accessible electronically notwithstanding the open meeting requirements in the Bagley-Keene Act and the Brown Act. These provisions were due to expire on June 15, 2020.

On June 2, 2021, in response to a written request by a coalition of local government agencies, the Governor announced that N-29-20 will not terminate on June 15, and that state and local agencies can continue to conduct virtual public meetings as needed. The Governor did not set a new expiration date for N-29-20 and committed to provide advance notice before rescinding the order to provide the agencies the time needed to meet statutory and logistical requirements.

Under the Governor's announcement, state and local agencies may continue to hold meetings in California via teleconferencing and allow members of the public to observe and address the meeting by telephone or on the internet. All requirements of the Bagley-Keene Act and Brown Act requiring the physical presence of agency officials, staff or the public at public meetings remain suspended.

L131 - Responses to Comments from Gustavo Moreno, received September 30, 2020

L131-1 The comment indicates that the zip code provided as part of the address for mail in comments was incorrect on the website and that this error may have affected mail in comments. Mail in comments that were addressed to the referenced inaccurate zip code were received because the zip code included an extended ZIP+4 code that designated a more specific location. The "4386" extender is correct.

L132 - Responses to Comments from Jack Walworth and Dorothy Low, received September 30, 2020

L132-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L132-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L132-3 Please refer to Topical Responses No. 1, 5, 6, and 9.

L132-4 The Project does include a change in zoning.

L132-5 Please refer to Topical Response No. 5.

L132-6 Please refer to Response L110-15.

L132-7 Please refer to Response L110-15.

L133 - Responses to Comments from Jennifer Wright, received September 30, 2020

L133-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 1.

L133-2 The commenter reiterates comments submitted by the Coalition for Scholl Landfill Alternatives (CSLA) on September 23, 2020. Please refer to Response L84 from CSLA, received September 23, 2020. Please also refer to Topical Responses No. 1, 2, 5, 6, and 9.

L133-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L134 - Responses to Comments Judy Gate, received September 30, 2020

L134 The comments within this letter directly reiterate comments previously submitted by Marwan and Amy Ataya on September 6, 2020. Please refer to responses to comments of L40 from Marwan and Amy Ataya, received September 6, 2020.

L135 - Responses to Comments from Koreen A. Cea, received September 30, 2020

L135-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L135-2 Please refer to Topical Responses No. 7 and 9.

L135-3 Please refer to Topical Response No. 7.

L135-4 Please refer to Response L127-5.

L135-5 Please refer to Topical Responses No. 1 and 10.

L135-6 Please refer to Topical Response No. 1.

L135-7 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's

statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 7 and 9.

L136 - Responses to Comments from LA River Communities for Environmental Equity, received September 30, 2020

L136-1 Please refer to Topical Response No. 5.

L136-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L136-3 Please refer to Response L127-5.

L136-4 Please refer to Topical Responses No. 1, 5, and 7.

L136-5 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 7 and 9.

L137 - Responses to Comments from Linda Vista-Annandale Association, received September 30, 2020

L137-1 The comment is a transmittal of an attached comment letter from the Linda Vista-Annandale Association.

L137-2 The comment introduces the Linda Vista-Annandale neighborhood and its relationship to Scholl Canyon Landfill.

L137-3 Sensitive residential receptors closest to the Project site have the potential to be exposed to the highest magnitude of environmental impacts including but not limited to air quality and noise. The Draft EIR analyzes potential environmental impacts to the nearest sensitive residential receptors. Residential receptors located further than those quantitatively analyzed in the Draft EIR would be subjected to similar or less potential environmental impacts. Please refer to Topical Responses No. 5 and 8.

L137-4 Please refer to Topical Response No. 5.

L137-5 Please refer to Topical Response No. 4.

L137-6 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L138 - Responses to Comments from Liuba Ruiz, received September 30, 2020

L138-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L138-2 Please refer to Topical Responses No. 1, 5, 7, and 9.

L138-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L139 - Responses to Comments from Los Angeles County Public Works, received September 30, 2020

L139-1 The comment is a transmittal of an attached comment letter submitted by the Los Angeles County Public Works.

L139-2 The comment provides a background of the Project and CEQA requirements.

L139-3 The comment provides a background of the Project. Please refer to Topical Response No. 1.

L139-4 Please refer to Topical Responses No. 7 and 9.

L139-5 Please refer to Topical Responses No. 5 and 8. The Project's air quality and greenhouse gas emissions impacts would be less than significant. The noted regulation related to CARB requiring manufacturer's sales of an increasing percentage of zero-emissions heavy duty trucks is not applicable to the Project's determination of potential environmental impacts. Further, the Project does not include heavy-duty truck use beyond which occurs during existing facility operation and maintenance. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L139-6 Please refer to Topical Response No. 8.

L139-7 Please refer to Topical Response No. 10. SB 1383, the "Short-Lived Climate Pollutants (SLCP): Organic Waste Methane Emissions Reductions" was signed into law in September 2016. SB 1383 establishes methane emissions reduction targets in a statewide effort to reduce emissions of short-lived climate pollutants (SLCP) in various sectors of California's economy. SB 1383 establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The law grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that not less than 20 percent of currently disposed edible food is recovered for human consumption by 2025. The City of Glendale, like all other cities and counties in California are required to comply with these regulatory requirements which do not eliminate the disposal of organic wastes into landfills but are aimed at reducing disposal. At present, CalRecycle, the League of California Cities and other entities across the state are working to find or create funding sources to assist cities and counties to comply with the unfunded mandates of this legislation. Cities and counties are seeking ways to avoid increases customer waste disposal rates and to provide education, methods, materials, personnel and administration to achieve SB 1383's targets. SB 619 as currently proposed is seeking to delay SB 1383's implementation in order get the necessary funding and infrastructure in place to comply with SB 1383's mandates. However, even with the implementation of SB 1383, organic waste will continue to be disposed of within Scholl Canyon Landfill for the foreseeable future and the previously deposited organic waste will continue to degrade for many years, which necessitates the on-going capture and incineration of methane as required by the SCAQMD. Please refer to Topical Responses No. 1 and 5.

L139-8 Combusting LFG greatly reduces odors associated with LFG. Odors from combusting the LFG in the reciprocating internal engine generators, regenerative flare, and existing or new flares would be similar to odors generated under baseline conditions which included 100 percent combustion of LFG in the existing flares. Please also refer to Response L94-24 for a discussion on pipeline decommissioning and potential odors during construction.

L139-9 The comment provides contact information in the event of any questions regarding the comments within the letter.

L140 - Responses to Comments from Matt Bissonnette, received September 30, 2020

L140-1 The comment introduces an attachment that contains comments and contains a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L140-2 Please refer to Topical Response No. 1.

L140-3 Please refer to Topical Response No. 5.

L140-4 Please refer to Topical Response No. 5.

L140-5 Please refer to Topical Responses No. 6, 7, and 9.

L140-6 Please refer to Topical Responses No. 4 and 8.

L140-7 Please refer to Topical Response 10 and Responses L110-11 and L110-15.

L140-8 Please refer to Topical Responses No. 1, 5, and 7.

L141 - Responses to Comments from Miri Hindes, received September 30, 2020

L141-1 This is a duplicate comment letter received separately from the original submission. Please see responses to comments to L121 from Miri Hindes, received September 29, 2020. Please also refer to Topical Response No. 10.

L142 - Responses to Comments from Mitchell Rubinstein, received September 30, 2020

L142-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L142-2 Please refer to Topical Response No. 9.

L142-3 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L143 - Responses to Comments from Councilmember-elect Kevin de León, received September 30, 2020

L143-1 The comment is an introduction to the comment letter and contains a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L143-2 Please refer to Topical Responses No. 5 and 9.

L143-3 Please refer to Topical Responses No. 1, 5, and 8.

L143-4 Please refer to Topical Response No. 1.

L143-5 The comment does not identify how the proposed Project "violates the intent of [Senate Bill 100] the law." The comment does not state that the proposed Project violates the letter of SB 100. In fact, the Project does the opposite of what is alleged in this comment.

On September 10, 2018, Governor Jerry Brown signed SB 100 into law. SB 100 is an environmental measure that sets a commitment to establish 100 percent clean energy in California by 2045, speeding up the state's timeline for moving to carbon-free power sources. Under the law, 60 percent of the power purchased by California utilities must come from renewable sources by 2030. California has a multi-hundred-page handbook providing guidance on what is considered renewable power resources – everything from solar to *biogas* to wave and tidal current energy. The additional 40 percent of the power California's utilities will deliver to residents, businesses, and government agencies must come from 'zero-carbon' sources. SB 100 requires all retail electricity to be carbon-free by 2045. According to the U.S. Energy Information Administration, Biogas qualifies as a renewable fuel for electricity generation in state renewable portfolio standards. It also qualifies under the U.S. Renewable Fuel Standard Program as an advanced or cellulosic biofuel and under California's Low Carbon Fuel Standard as a feedstock for low carbon fuels. *Nearly all of the biogas now consumed in the United States is produced from anaerobic decomposition and used for electricity generation.* Biogas is a defined renewable energy source recognized by SB 100 renewable portfolio standards and its guidance. The Project is specifically targeted at compliance with California's aggressive clean energy mandate in SB 100 and will help Glendale and the state achieve these goals. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L143-6 Please refer to Topical Responses No. 1, 5, and 7.

L143-7 Please refer to Topical Response No. 1.

L143-8 Please refer to Topical Responses No. 1 and 5.

L143-9 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also respond to Topical Response No. 4.

L143-10 The comment is a general statement about the commenter's opinion of (or preference about) the Project. Please also refer to Topical Response No. 5. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L144 - Responses to Comments from Patricia, received September 30, 2020

L144-1 The comment introduces comments regarding the Project.

L144-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. Please refer to Topical Responses No. 1-9. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L144-3 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. Please also refer to Topical Responses No. 5 and 7.

L145 - Responses to Comments from Rebecca Addelman, received September 30, 2020

L145-1 This comment is an introduction to attached comments and a general statement about the commenter's concerns for (or preference about) the Project and introduces an attached comment letter. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L145-2 The attached comment letter reiterates comments submitted by Matt Bissonnette on September 30, 2020. Please see responses to comments to L140 from Matt Bissonnette, received September 30, 2020. Please refer also to Topical Response No. 10.

L146 - Responses to Comments from Robinson Wills, received September 30, 2020

L146-1 Please refer to Topical Responses No. 6 and 7.

L147 - Responses to Comments from Sergio Keusayan, received September 30, 2020

L147-1 The commenter directly reiterates comments submitted by Audry Zarokian on September 29, 2020. Please refer to responses to comments of L116 from Audry Zarokian, received September 30, 2020.

L148 - Responses to Comments from South Coast Air Quality Monitoring District (SCAQMD), received September 30, 2020

In response to the SCAQMD comment letter dated September 30, 2020, the facility updated the air quality impact analysis to reflect the updated LFG profile. Based on most recent data, LFG production was estimated to be 6,200 scfm and 135.26 MMBtu/hr, based upon a measured heating value of 363.3 Btu/cf (36 percent methane). Therefore, the LFG will be utilized as follows:

- Four reciprocating internal combustion engines (RICE): 105.36 MMBtu/hr.;

- Regenerative (regen) gas flare: 5 MMBtu/hr.; and
- Flare system (reminder of the LFG): 24.90 MMBtu/hr.

There are no changes made to the assumed fuel consumption for the engines; therefore, there are no updates on the engine analysis. The air quality analysis was updated to reflect the volume of gas to be consumed by the regenerative gas (regen) flare and the flare system.

L148-1 The comment notes submissions of SCAQMD's comments on the Draft EIR.

L148-2 The comment introduces SCAQMD's comments on the Draft EIR.

L148-3 **L148-3, L148-A-4 – CEQA Air Quality and Health Risk Impacts from the Regenerative Gas Flare**

The regen flare will be part of the proposed Project; therefore, air quality and health risk impacts from this equipment were analyzed.

The flare will be utilized to incinerate off-gas from the LFG sulfur and siloxane removal system. The flare is rated at 5 MMBtu/hour and will utilize LFG as its main fuel. Natural gas will be supplied to the flare when the BTU content of the LFG is reduced over time. Since the natural gas supply is expected to be less than 10 percent of total capacity based on the higher heating value of the fuel and natural gas is a cleaner gas than LFG, the emissions inventory and modeling analysis were performed based on 100 percent LFG. The equipment information is summarized in Table 1.

Table 1 – Regenerative Flare Specifications

Description	Specification
Manufacturer:	Perennial Energy (PEI)
Max. Heat Input Rating:	5 MMBtu/hr.
Fuel:	Landfill gas
Stack Height:	28 feet
Stack Diameter:	48 inches
Max. Exhaust Flow Rate:	2,227 scfm (8,310 acfm)
Max. Exhaust Temperature:	1,400 °F

The regen flare is expected to meet the NO_X, CO, and VOC emission standards of Rule 1118.1. These emission standards are 0.025 lbs./MMBtu for NOX, 0.06 lbs./MMBTU for

CO, and 0.038 lbs./MMBtu for VOC. A PM10/2.5 emission factor of 6.1 lbs./MMCF based upon SCAQMD prior engineering evaluation on Los Angeles County Sanitation District permit application number 245157 was used to estimate the PM emissions from the flare. The SO_X emissions were calculated based upon the allowable sulfur content concentration of 60 ppmv for LFG. To estimate the potential emissions, the regen flare is assumed to be operated at 24 hours per day, 7 days per week, and 52 weeks per year. Table 2 summarizes the emission inventory of the regen flare.

Table 2 – Criteria Pollutant Emission Summary

Pollutant	Max. Daily Emissions, lbs./day	Max. Monthly Emissions, lbs./month	30-Day Average Emissions, lbs./day	Annual Emissions, lbs./year
NO_X	3.00	90	3	1,095
CO	7.20	216	7	2,628
VOC	4.56	137	5	1,664
PM10/2.5	2.01	60	2	735
SO_X	3.34	100	3	1,220

Toxic Air Contaminant (TAC) emissions are expected because the regen flare will utilize LFG. Similar to the existing flare system, TAC emissions from the regen flare will reflect emission factors based on LFG samples, SCAQMD AB2588 and USEPA AP-42 default emission factors. Additionally, dioxins and furan compounds emissions were calculated based on the source test conducted on the LFG combustion in the boiler at Grayson power plant. The source test shows octachlorodibenzo-p-dioxin (dioxin and furan compounds) emission factor of 5.33E-10 lbs./mmcf. Table 3 summarizes the TAC emission inventory for the regen flare.

Table 3 – Toxic Air Contaminants Emission Summary

TAC	CAS	Max. Hourly Emissions, lbs./hr.	Annual Emissions, lbs./year
1,1,1 – Trichloroethane	71-55-6	1.99E-06	0.0174
1,1,2,2 – Tetrachloroethane	79-34-5	1.32E-04	1.1599
1,2 – Dibromoethane	106-93-4	5.47E-06	0.0479
1,1 – Dichloroethane	75-34-3	2.74E-06	0.0240
1,1 – Dichloroethene	75-35-4	1.31E-06	0.0115
1,2 – Dichloroethane	107-06-2	7.17E-06	0.0628
1,2 - Dichloropropane	78-87-5	1.45E-05	0.1266

TAC	CAS	Max. Hourly Emissions, lbs./hr.	Annual Emissions, lbs./year
2 – Propanol	67-63-0	2.14E-03	18.7479
Acetonitrile	75-05-8	2.74E-05	0.2404
Acrylonitrile	107-31-1	2.39E-04	2.0909
Benzene	71-43-2	9.49E-05	0.8315
Benzyl chloride	100-44-7	1.17E-05	0.1024
Carbon disulfide	75-15-0	3.14E-05	0.2749
Carbon tetrachloride	56-23-5	2.30E-06	0.0201
Carbonyl sulfide	463-58-1	2.09E-05	0.1832
Chlorobenzene	108-90-7	1.27E-05	0.1114
Chlorodifluoromethane	75-45-6	7.99E-05	0.6998
Chloroethane	75-00-3	5.73E-05	0.5021
Chloroform	67-66-3	1.70E-06	0.0149
Chloromethane	74-87-3	4.34E-05	0.3803
Dichlorobenzene	106-46-7	8.57E-05	0.7504
Dichlorodifluoromethane	75-71-8	1.35E-03	11.8177
Dichlorofluoromethane	75-43-4	1.92E-04	1.6787
Dichloromethane (methylene chloride)	74-87-3	7.18E-06	0.0629
Dioxins and Furans	3268-87-9	7.33E-12	6.42E-08
Ethylbenzene	100-41-4	2.07E-04	1.8161
Ethylene dibromide	106-93-4	1.34E-07	0.0012
Formaldehyde	50-00-0	1.61E-02	140.8201
Fluorotrichloromethane	75-69-4	7.42E-05	0.6500
Hexane, n-	110-54-3	4.02E-04	3.5249
Hydrogen chloride	7647-01-0	7.36E-02	644.5
Hydrogen sulfide	7783-06-4	8.15E-04	7.1393

TAC	CAS	Max. Hourly Emissions, lbs./hr.	Annual Emissions, lbs./year
Mercury (total)	7439-97-6	2.08E-06	0.0182
Methyl ethyl ketone	78-93-3	3.63E-04	3.1828
Methyl isobutyl ketone	108-10-1	6.63E-04	5.8068
Tetrachloroethylene	127-18-4	9.04E-05	0.7917
Toluene	108-88-3	1.77E-03	15.5284
Trichloroethylene	79-01-6	4.14E-05	0.3626
Vinyl chloride	75-01-4	2.06E-05	0.1802
Xylenes	1330-20-7	1.81E-03	15.8901

Air dispersion modeling and a health risk assessment were also performed to analyze air quality impact from this equipment. Please refer to Responses L148-5 and L148-A-6 and Topical Response No. 5.

L148-4 **L148-4, L148-A-5 – Worker Receptor Locations for the Health Risk Assessment**

Based on the SCAQMD FIND database, there are four nearby SCAQMD-permitted facilities. These facilities are Glendale City, Public Works Engineering (Facility ID 37361), Los Angeles County Sanitation District (Facility ID 45262), Scholl Canyon Golf Course (Facility ID 103426), and Agrominn (Facility ID 192443). The health risk assessment does not reflect employees of these facilities as worker receptors because of the following reasons:

- Glendale City, Public Works Engineering Facility is owned and operated by the City of Glendale, which will also own and operate the power generation facility.
- Los Angeles County Sanitation District currently owns and operates flares that will be replaced by the power generation facility. Ultimately the City of Glendale will be the operator for this flare system once the landfill is closed.
- Scholl Canyon golf course employees are included as worker receptors in the updated health risk assessments. Scholl Canyon golf course is located outside the property boundary used in the health risk assessment.
- Agrominn is a waste digester facility; and its operation is only temporary and at the discretion of the City of Glendale. The City of Glendale expects that Agrominn will cease operations by the time the power generation facility is constructed.

L148-5 **L148-5, L148-A-6 – Air Dispersion Modeling Parameters**

Air dispersion modeling and the health risk assessment were completed to reflect the following updated parameters as suggested by SCAQMD comment letter:

- Updated the ambient air quality background concentrations from the original period of 2014 through 2018 to the period of 2015 through 2019.
- Revised the landfill property boundary by reducing the west property boundary of the landfill. The revised facility excludes the Lower Scholl Canyon Park (Park). Additionally, the north boundary of the landfill was adjusted to exclude all the Scholl Canyon Golf Course property.
- Updated Burbank Airport meteorological data from the initial period of 2008 through 2012 to the period of 2012 through 2016.

Table 4 shows the ambient air quality impact analysis results that reflect the above-described changes to model input.

Table 4
Ambient Air Quality Impact Analysis Result
Scholl Canyon Repowering Generation Project

Pollutant	Avg. Period	Project Impact	Background[a]	New Ambient	Limiting Standard	Type of Standard
NO_2[b]	1-HR	0.03702 ppm	0.0719 ppm	0.1089 ppm	0.18 ppm	CAAQS
NO_2[b]	1-HR (98th percent)	0.02083 ppm	0.0593 ppm	0.0801 ppm	0.10 ppm	NAAQS
NO_2[c]	Annual	0.00023 ppm	0.0154 ppm	0.0156 ppm	0.03 ppm	CAAQS
CO	1-HR	0. 1748 ppm	2.60 ppm	2.7748 ppm	20 ppm	CAAQS
CO	8-HR	0.0473 ppm	1.60 ppm	1.6473 ppm	9 ppm	CAAQS
PM10	24-HR	1.373 ug/m^3	96 ug/m^3	97.373 ug/m^3	Allowable increase of 2.5 ug/m^3	CAAQS / SCAQMD Allowable Increase
PM10[d]	24-HR (6th highest over 5 years)	1.046 ug/m^3	96 ug/m^3	97.046 ug/m^3	150 ug/m^3	NAAQS
PM10	Annual	0.193 ug/m^3	34.4 ug/m^3	34.593 ug/m^3	Allowable increase of 1.0 ug/m^3	CAAQS / SCAQMD Allowable Increase
PM2.5	24-HR	1.373 ug/m^3	30.5 ug/m^3	31.873 ug/m3	Allowable increase of 2.5 ug/m^3	CAAQS / SCAQMD Allowable Increase
PM2.5[e]	24-HR (8th highest)	0.956 ug/m^3	30.5 ug/m^3	31.456 ug/m3	35 ug/m^3 Below SIL of 1.2 ug/m^3	NAAQS EPA Significant Impact Level (SIL)

PM2.5	Annual	0.193 ug/m^3	12.58 ug/m^3	12.773 ug/m^3	Below SIL of 0.3 ug/m^3 Allowable increase of 1.0 ug/m^3	EPA Significant Impact Level (SIL) CAAQS / SCAQMD Allowable Increase
SO_2	1-HR	0.0032 ppm	0.018 ppm	0.0212 ppm	0.25 ppm	CAAQS
SO_2[f]	1-HR (99th percent)	0.00229 ppm	0.0094 ppm	0.0117 ppm	0.075 ppm	NAAQS
SO_2	24-HR	0.00071 ppm	0.002 ppm	0.0027 ppm	0.04 ppm	CAAQS

Notes:
a) Background values are based on the highest concentrations monitored at West San Gabriel Valley monitoring station (Station No. 088) during 2015 through 2019, except the PM10 and SO_2. The background values of PM10 and SO_2 were based on the readings from the Central Los Angeles monitoring station (Station No. 087) since the West San Gabriel Valley monitoring station did not record any background data for those pollutants.
b) NO2 1-hour modeling was refined using the AERMOD Ambient Ratio Method (ARM) option, which assumes an 80 percent conversion factor of NOX to NO_2
c) NO2 annual modeling was refined using the AERMOD ARM option, which assumed a 75 percent conversion factor of NOX to NO2.
d) PM10 24-hour modeled values were based on the maximum 6th highest concentration over 5 years period.
e) PM2.5 24-hour modeled values were based on the 8th highest concentration averaged over 5 years period with the background concentrations of 98th percentile of 24-hour data averaged over 5 years period.
f) SO2 1-hour modeled values were based on the 4th highest concentration averaged over 5 years period with the background concentrations of 99th percentile of 1-hour data averaged over 5 years period.
g) There are receptors surrounding the facility at lower and higher elevations than the emission sources. The model reflects non-default option (flat terrain) on all receptors at lower elevations; and a default option (complex terrain) was selected to on receptors above the emission sources base elevation.

As shown in Table 4, the modeled highest concentration of NO_2, CO, and SO_2 plus the applicable background concentration did not result in any exceedances of the federal and state AAQS. For PM10 and PM2.5, the modeled maximum concentrations from the Project did not cause any exceedances of the state significant thresholds. Attachment B of the errata includes additional information regarding model input / output files.

Health Risk Assessment

Based upon the updated LFG production and air dispersion models, a health risk assessment (HRA) was conducted to evaluate the potential cancer, chronic, and acute health impacts from the Project. The HRA was prepared in accordance with Office of Environmental Health Hazard Assessment (OEHHA) guideline dated February 2015 and SCAQMD Risk Assessment Procedures for Rule 1401, 1401.1, and 212

Version 8.0 dated June 5, 2015. Two software programs, AERMOD and HARP2, were utilized for the HRA. AERMOD is an air dispersion model that was used to estimate the ground level TAC concentrations and the Hotspots Analysis and Reporting Program (HARP2) was used to estimate the cancer and non-cancer health impacts for individual receptors using ground level concentration data for multiple pollutants through multiple pathways.

The following Table 5 summarizes the highest maximum individual cancer risk (MICR), hazard index acute (HIA), and hazard index chronic (HIC) values at any receptor locations outside the facility boundary.

TABLE 5
HEALTH RISK ASSESSMENT RESULT

Equipment[a]	Cancer Risk	Chronic Health Index	Chronic 8-hour Health Index	Acute Health Index	Cancer Risk Significance Threshold	Acute / Chronic Index Significance Threshold
Project	0.26E-06	0.016	0.0008	0.0076	10.00E-06	1.00

Note: The cancer risk, chronic health index, chronic 8-hour health index, and acute health index values of the proposed project shown in Table 5 are the highest values of any receptors outside the landfill property boundary. Since the values are already below the significance threshold of 10E-06 for cancer risk and 1.00 for the health index, no further analysis was conducted to obtain readings at the nearest residential or worker receptors.

Pursuant to OEHHA Guideline and SCAQMD policy, if MICR at a representative receptor location is greater than 1.00E-06, an additional analysis must be conducted to determine Cancer Burden. As shown in the Table 5, the MICR for the Proposed Project is less than 1.00E-06; therefore, Cancer Burden analysis is not necessary. Attachment C of the errata includes additional information regarding the health risk assessment.

L148-6 Please refer to Topical Response No. 5 that includes a discussion of potential air quality/health risk impacts of the regenerative flare.

L148-7 Please refer to Topical Response No. 5 and Responses L148-1 to L148-7 and L148-A-1 to L148-A-6.

L148-A-1 The comment summarizes the proposed Project description and is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L148-A-2 The comment summarizes the permit applications SCAQMD has received from the City of Glendale for the proposed Project. The comment is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L148-A-3 SCAQMD's comment letter provides its interpretation of the findings of significance in the Draft EIR, but that interpretation reflects an incomplete review of the Draft EIR because SCAQMD's summary of the Project does not reflect the full analysis and findings in the Draft EIR. The Draft EIR's potential air quality impact analysis determines that the Project's daily CO emissions would exceed the daily 550-pound significance threshold (Draft EIR, Section 4.2.4.4 Table 13), however, the Draft EIR includes a refined ambient air quality impact analysis, and based upon that more refined analysis it was determined that the Project will have a less than significant impact on AQ. SCAQMD CEQA policy allows a refined ambient air quality analysis in place of mass daily emissions to determine the significance of CO emissions. Table 15 of the Draft EIR contains results of the refined ambient air quality impact analysis. When added to existing background concentrations, the Project would present a maximum ambient CO concentration of 2.77 ppm (approximately 13.8% of the 20 ppmv ambient air quality standard for CO). On an 8-hour averaging basis, the impacts of the Project would lead to a maximum concentration of approximately 1.6 ppm (approximately 18% of the 9 ppm ambient air quality standard). The results of the refined air quality impact analysis demonstrate that CO emissions from the Project would not significantly add to existing ambient CO concentrations, nor would it result in a violation of federal or state ambient air quality standards for CO (an "attainment" criteria air pollutant for which the South Coast Air Basin has met both federal and state ambient air quality standards for since 2007). Based upon the results of the ambient air quality impact analysis, the City concluded that CO emissions from the Project would be less than significant. The City further stated in section 6.1 of the Draft EIR, that the Project would not result in any significant and unavoidable environmental impacts based on the refined air quality impact analysis. The complete air quality analysis accurately reflects that CO emissions would not result in violation of ambient air quality standards and would have a less than significant air quality impact.

L148-A-4 Please refer to Topical Response No. 5 that includes a discussion of potential air quality/health risk impacts of the regenerative flare.

L148-A-5 Please refer to Topical Response No. 5 that includes a discussion of potential air quality impacts related to the report boundary suggested for consideration by SCAQMD.

L148-A-6 Please refer to Topical Response No. 5 that includes a discussion of potential air quality impacts related to changes in baseline conditions between preparation of the MND and EIR.

L148-A-7 Responses to SCAQMD comments of the Draft EIR have been noticed to SCAQMD pursuant with CEQA requirements. Please refer to Responses L148-1 to L148-7 and L148-A-1 to L148-A-6.

L148-B-1 to
L148-B-5 These are the 2017 comments from SCAQMD on the MND and are no longer applicable to the Draft EIR.

L149 - Responses to Comments from Susan Harris, received September 30, 2020

L149-1 Please refer to Topical Response No. 5.

L149-2 Please refer to Topical Response No. 9.

L150 - Responses to Comments from Teresa, received September 30, 2020

L150-1 Please refer to Topical Responses No. 5 and 9.

L150-2 Please refer to Topical Response No. 5.

L150-3 Please refer to Topical Response No. 9.

L150-4 Please refer to Section 5.0, Alternatives, of the Draft EIR for the analysis of Project alternatives required for an EIR under the CEQA Guidelines. The alternatives selected for analysis represent a reasonable range that meet the Project objectives, reduce Project impacts is some areas, and will assist in informed decision-making. Please refer to Topical Response No. 10.

L151 - Responses to Comments from Glendale Environmental Coalition and Sierra Club, received October 1, 2020

L151-1 The comment introduces the Glendale Environmental Coalition (GEC) and Sierra Club, identifies their relationship to Glendale, and presents their goal of advocating for clean energy. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L151-2 The comment provides a background of the Project and environmental review.

L151-3 The environmental impact thresholds of significance included in the Draft EIR are based on CEQA Guidelines and requirements. Neither CEQA nor the CEQA Guidelines require that an EIR include studies comparing the project's environmental costs with its benefits. See *San Francisco Ecology Ctr. v City & County of San Francisco* (1975) 48 CA3d 584, 595. The only direct comparison required in an EIR is the comparison of project alternatives, and a cost-benefit analysis is not required in making that comparison. 14 Cal Code Regs §15126.6(d). Please also refer to Topical Response No. 10.

L151-4 The Project has been designed and potential environmental impacts analyzed based on measurable data such as LFG volume and chemical composition. The Project has further been designed to meet applicable regulatory requirements such as stormwater pollution

prevention and air emissions. Please refer to Topical Response No. 5 and Response L5-1.

L151-5 Please refer to Topical Responses No. 1 and 5.

L151-6 Please refer to Topical Response No. 5

L151-7 The objective of the Project is to safely capture all the LFG generated by the Scholl Canyon Landfill as required by regulatory standards and use the captured LFG generated by the Scholl Canyon Landfill for beneficial purposes such as combusting the LFG to generate power. Please also refer to Responses L110-11 and L110-15.

L151-8 The comment is a general statement about the commenter's opinion of (or preference about) the Project. Please refer to Topical Reasons No. 5. The reduction in LFG impacts in inherent in the Project objectives. The burning of biogas to generate power meets the goals of SB 100 and qualifies under California's Renewable Portfolio Standard for use of a renewable power source, and thus assists the City to meet and exceed state requirements for renewable electricity generation. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. See also Response L143-5.

L151-9 Please refer to Topical Response No. 5.

L151-10 Please refer to Topical Response No. 5. The existing permitted flaring system is not operated by the City of Glendale; it is owned, operated, and managed by the Los Angeles County Sanitation District.

L151-11 The estimated construction emissions presented in Section 4.2 of the Draft EIR includes emissions from portable construction equipment such as generators. Construction emissions would be below SCAQMD thresholds of significance. Please refer to Topical Responses No. 5 and 9.

L151-12 Please refer to Topical Response No. 5.

L151-13 Please refer to Responses. No. L110-11, L110-15 and L95-13. The alternatives evaluation in Section 5.0 of the Draft EIR further consider or evaluate each alternative suggested during public scoping for the Draft EIR. Please also refer to Topical Response No. 10.

L151-14 Please refer to Response L151-13. Please refer to Topical Response No. 10.

L151-15 Please refer to Response L151-13. Please refer to Topical Responses No. 5 and 10.

L151-16 Please refer to Topical Responses No. 5 and No. 10 and Response L94-15.

L151-17 Please refer to Topical Responses No. 5 and No. 10.

L151-18 Alternative 2 would require more energy than the Project as more energy would be expended to clean the LFG to a higher standard required for conversion to RNG and more energy would be required to compress the RNG for offsite conveyance. Section 5.6.2.2 of the Draft EIR currently notes that Alternative 2 would utilize more energy than the Project and therefore Alternative 2's potential energy use impacts would be greater than those of the Project. Please refer to Topical Response No. 10.

L151-19 Similar to Alternative 2, Alternative 3 would require more energy to clean the LFG to a higher standard for conversion to LNG as well as more energy necessary to support a vehicle fueling station than the energy use of the Project. Therefore, Alternative 3's potential energy use impacts would be greater than those of the Project. An Alternative project location at Grayson Power Plant was evaluated as Alternative 4 because it is the only location within the City of Glendale that is under City control, potentially had adequate space, has industrial zoning, and existing infrastructure connections for electoral generation needs. Development of a site that did not have these attributes would have greater environmental impacts than those for Alternative 4 and would not reduce any significant environmental impacts of the Project. Please refer to Topical Response No. 10 and Response L151-18.

L151-20 Existing Unit 9 and the generation units proposed as part of the Grayson Repowering Project are not designed to operate on LFG. The existing boilers which are designed to operate on LFG are no longer combusting LFG or planned to combust LFG in the future. Because the generation units operating on LFG would be located closer to residences under Alternative 4 than the proposed Project, Alternative 4 would have greater air quality and noise impacts than the Project. There would be an incremental increase in GHG emissions associated with Alternative 4 from an increase in energy needed to convey the LFG to an offsite location. Please refer to Topical Response No. 10. The commenter states opposition to Alternative 4 due to environmental impacts and additional infrastructure at Grayson Power Plant. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 10.

L151-21 Please refer to Topical Response No. 10 and Responses L110-11 and L110-15.

L151-22 The commenter states that the scope of the CEQA document should be for the 2019 Integrated Resources Plan rather than limited to the Project. Adoption of the 2019 Integrated Resources Plan was found to be exempt from CEQA. The proposed Project's potential environmental impacts were evaluated pursuant with the requirements of CEQA in this EIR. Please refer to Topical Responses No. 1, 2, and 3.

L151-23 The commenter provides a summary of comments and concerns expressed throughout the comment letter and requests that the City release the Final EIR for public review at

least 45 days before it is presented to the Planning Commission or any other commission or governmental body, to allow a full opportunity for public participation in this decision that is crucial to our community. The comment also expresses support of Alternative 2, converting LFG to natural gas, and the rejected fuel-cell alternative. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 10.

L152 - Responses to Comments from Mark Alan Rothenberg, received October 1, 2020

L152-1 Please refer to Topical Responses No. 1, 5 and 7.

L152-2 Please refer to Topical Response No. 9.

L152-3 Please refer to Topical Response No. 9.

L152-4 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Responses No. 1, 5, 7, and 9.

L152-5 Please refer to Topical Responses No. 1, 5, 7, and 9.

L152-6 Please refer to Section 4.9 of the Draft EIR for a discussion of the Project's consistency with applicable land use designations and zoning which were determined to be less than significant.

L153 - Responses to Comments from Nicole and Brian McGaffey, received October 1, 2020

L153-1 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L153-2 Please refer to Topical Response No. 5.

L153-3 The commenter expresses concern over the location of the proposed Biogas Renewable Generation Project stating that it is too close to residences. The Draft EIR analyzes the Project's potential impacts to sensitive receptors including residential and education land uses. Please also refer to Topical Responses No. 5, 6, 7, 8, and 9 for a discussion related to air quality, geology, hazards and hazardous materials, noise, traffic, and wildfire.

L153-4 Please refer to Topical Responses No. 7 and 9.

L153-5 Please refer to Topical Responses No. 1, 6, and 7.

L153-6 The comment expresses support of Alternative 2, converting LFG to natural gas. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L153-7 Please refer to Topical Response No. 1.

L154 - Responses to Comments from Raymond Cho, received October 1, 2020

L154-1 Please refer to Topical Responses No. 1, 4, 5, and 8.

L154-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. Please also refer to Topical Response No. 5. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L155 - Responses to Comments from The Eagle Rock Association (TERA), received October 1, 2020

L155-1 The comment is a transmittal of an attached comment letter submitted by Greg Merideth on behalf of the Eagle Rock Association (TERA). The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L155-2 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L155-3 Please refer to Topical Response No. 9.

L155-4 The comment expresses support of Alternative 2, converting LFG to natural gas. Please also refer to Topical Responses No. 2 and 5. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please refer to Topical Response No. 10.

L155-5 Please refer to Topical Responses No. 3 and 5.

L155-6 Please refer to Topical Responses No. 1, 5, 7, and 9.

L156 - Responses to Comments from Walt Kasha, received October 5, 2020

L156-1 The commenter introduces themself and identifies their relationship to Glenoaks Canyon. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

L156-2 The commenter directly reiterates comments submitted by Priscila Kasha on September 6, 2020. Please refer to responses to comments of L41 from Priscila Kasha, received September 6, 2020. Please also refer to Topical Response No. 10.

L157 - Responses to Comments from Armen and Chantiel M., received October 5, 2020

L157 Comments (L157-1 through L157-5) reiterate comments submitted by Marwan and Amy Ataya on September 6, 2020. Please refer to responses to comments of to L40.

L157-6 The comment expresses support of Alternative 2, converting LFG to natural gas. Please refer to Section 5.0. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project. Please also refer to Topical Response No. 10.

L158 - Responses to Comments from Hilda L. Solis, County of Los Angeles Board of Supervisors, First District, received March 3, 2021

L158-1 The comment notes Ms. Solis's representation of Eagle Rock and sharing of community concerns regarding the Project. Please refer to Sections 4.1 through 4.14 of the Draft EIR for a discussion of the Project's potential environmental impacts. Please also refer to Topical Responses No. 1 through 10 for supplemental information and clarification contained in the Final EIR based on comments received during public review of the Draft EIR.

L158-2 Please refer to Topical Response No. 9.

L158-3 Please refer to Topical Responses No. 7 and 9 as well as Response to L139.

L158-4 Please refer to Response L127-5.

L158-5 Please refer to Responses L110-11 and L110-115 and Topical Response No. 7.

L158-6 The comment is a general statement about the commenter's opinion of (or preference about) the Project. The comment does not identify a specific environmental analysis or CEQA issue relative to the Final EIR and compliance with CEQA. The commenter's statement is included in the Final EIR for the decision-maker's consideration as part of the City's deliberations on the Project.

10.0 MITIGATION MONITORING AND REPORTING PLAN

The following mitigation measures shall apply to the Grayson Repowering Project to reduce identified impacts to less than significant levels.

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
BIO-1	**BIO-1: Implement a Worker Environmental Awareness Program.** Prior to any Project activities on the site (i.e., surveying, mobilization, fencing, grading, or construction), a Worker Environmental Awareness Program (WEAP) shall be prepared and implemented by a qualified biologist(s). The WEAP shall be finalized and administered prior to construction mobilization, and implemented throughout the duration of the construction activities, such as when new contractor employees or subcontractors begin working on-site. • The WEAP shall include, at a minimum, the following items: o Training materials and briefings shall include but not be limited to: a discussion of the Federal and State Endangered Species	Prior to construction mobilization, and throughout the duration of the construction activities.	City of Glendale	Glendale Water and Power Environmental Coordinator	Review and approval of WEAP prior to construction. Retention of WEAP training logs.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	Acts, Bald and Golden Eagle Protection Act, and the Migratory Bird Treaty Act; the consequences of non-compliance with these acts; identification and values of plant and wildlife species and significant natural plant community habitats; hazardous substance spill prevention and containment measures; a contact person and phone number in the event wildlife needs to be relocated or dead or injured wildlife is discovered; and a review of mitigation requirements. ▪ A discussion of measures to be implemented for avoidance of the sensitive resources discussed above and the identification of an onsite contact in the event of the discovery of sensitive species on the site; this					

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Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	shall include a discussion on microtrash. ▪ Protocols to be followed when roadkill is encountered in the work area or along access roads and the identification of an onsite representative to whom the roadkill will be reported. Roadkill shall be reported to the appropriate local animal control agency within 24 hours. ▪ Maps showing the known locations of special-status wildlife, populations of rare plants and sensitive vegetation communities, seasonal depressions and known waterbodies, wetland habitat, exclusion areas, and other construction					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	limitations (e.g. limited operating periods, etc.). These features shall be included on the proposed Project plans and specifications drawings. ▪ Literature and photographs or illustrations of potentially occurring special-status plant and/or wildlife species shall be provided to all Project contractors and heavy equipment operators. • Evidence that all onsite construction and security personnel have completed the WEAP prior to the start of site mobilization. A special hardhat sticker or wallet size card shall be issued to all personnel completing the training, which shall be carried with the trained personnel at all times while on the proposed Project site. All new personnel shall receive					

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Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	this training and may work in the field for no more than five days without participating in the WEAP, accompanied by staff that has undergone the training. A log of all personnel who have completed the WEAP training shall be kept on-site. • The contract specification books shall include all project conditions as they relate to biological resources and shall be kept on-site at all times (e.g., in the break room, construction foreman's vehicle, construction trailer, etc.) for the duration of the construction. This information shall be easily accessible for personnel in all active work areas. • Develop a standalone version of the WEAP, that covers all previously discussed items above, and that can be used as a reference for maintenance personnel during Project operations. • An environmental monitor shall be retained during construction of the					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	proposed project and shall be directly involved with the implementation and enforcement of the WEAP. A log of all personnel who have completed the WEAP training shall be kept on-site.					
BIO-2	BIO-2 Implement Best Management Practices Best Management Practice (BMP) shall be implemented as standard operating procedures during all ground disturbance and construction-related activities to avoid or minimize Project impacts on biological resources. These BMPs shall include, but are not limited to, the following: • Compliance with BMPs shall be documented and provided in a written report upon conclusion of construction activities. The report shall include a summary of the construction activities completed, a review of the sensitive plants and wildlife encountered, a list of compliance actions and any remedial actions taken to correct the actions, and the	During demolition and construction.	Demolition and Construction Contractor(s)	Glendale Water and Power Environmental Coordinator	Environmental monitoring and recordkeeping showing compliance BMPs.	

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Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	status of ongoing mitigation efforts. • Prior to ground disturbance of any kind, the project work areas shall be clearly delineated by stakes, flags, or other clearly identifiable system. • Vehicles and equipment shall be parked on pavement, existing roads, and previously disturbed areas to the extent practicable. • No vehicles or equipment shall be refueled within 100 feet of an ephemeral drainage or wetland unless a bermed and lined refueling area is constructed. Spill kits shall be maintained on-site. • All general trash, food-related trash items (e.g., wrappers, cans, bottles, food scraps, cigarettes, etc.) and other human-generated debris shall be stored in animal proof containers and/or removed from the site each day. No deliberate feeding of wildlife shall be allowed. • All pipes and culverts removed from (that remain					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	on-site after removal) or brought on-site as part of new construction, with a diameter of greater than 4 inches, shall be capped or taped closed. Prior to capping or taping the pipe/culvert shall be inspected for the presence of wildlife by a qualified biologist. If encountered, wildlife shall be allowed to escape unimpeded. • No firearms shall be allowed on the project site, unless otherwise approved for security personnel. • To prevent harassment or mortality of listed, special-status species and common wildlife, or destruction of their habitats, no domesticated animals of any kind shall be permitted in any project area. • Use of chemicals, fuels, lubricants, or biocides shall be in compliance with all local, state and federal regulations, and shall include secondary containment. All uses of such compounds shall observe label and other restrictions mandated by					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	the U.S. Environmental Protection Agency, California Department of Food and Agriculture, and other state and federal legislation, as well as additional project-related restrictions deemed necessary by the USFWS and CDFW. • Any contractor or employee that inadvertently kills or injures a special-status animal, or finds one either dead, injured, or entrapped, shall immediately report the incident to the onsite representative identified in the WEAP. The representative shall contact the USFWS, CDFW, and the City of Glendale by telephone by the end of the day, or at the beginning of the next working day if the agency office is closed. In addition, formal notification shall be provided in writing within three working days of the incident or finding. Notification shall include the date, time, location and circumstances of the incident. Any threatened or endangered species found					

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Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	dead or injured shall be turned over immediately to CDFW or USFWS for care, analysis, or disposition. o Avoidance of vegetation removal or any other construction activities outside of the proposed Project boundaries. All Project impact areas must be clearly flagged prior to initiating work. In areas of temporary impacts, native vegetation shall be cut to ground level and the root system left intact to permit resprouting following work (unless within required fire clearance areas). All non-native vegetation within the temporary impact area shall be removed initially, and any regrowth eliminated throughout construction, the habitat restoration period and during the O&M phase. o Avoidance and minimization of construction activities resulting in impacts to					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	streambeds and banks of any ephemeral drainage. o All excavation, steep-walled holes or trenches in excess of 6 inches in depth shall be covered at the close of each working day by plywood or similar materials or provided with one or more escape ramps constructed of earth dirt fill or wooden planks. Trenches shall also be inspected for entrapped wildlife each morning prior to onset of construction activities and immediately prior to covering with plywood at the end of each working day. Before such holes or trenches are filled, they shall be thoroughly inspected for entrapped wildlife. Any wildlife discovered shall be allowed to escape before construction activities are allowed to resume or removed from the trench or hole					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	by a qualified biologist holding the appropriate permits (if required).					
BIO-3	**BIO-3 Implement Biological Construction Monitoring**. Prior to the commencement of ground disturbance or site mobilization activities, the City of Glendale shall retain a qualified biologist(s) to monitor Project construction. The biologist will have demonstrated expertise with special- status plants, terrestrial mammals, reptiles, and birds. Monitoring will occur continuously during initial ground disturbance for the duration of construction activities. Once initial ground disturbance is complete, monitoring will occur periodically during all construction activities within these areas. Activities related to the installation of the gas and water pipelines should be monitored daily for the duration of construction (not just initial ground disturbance). The qualified biologist(s) shall be present at all times during ground-disturbing activities immediately adjacent to, or within, habitat that supports populations of listed or special- status species. Any special-status plants shall be flagged for avoidance. Any special-status terrestrial species found within a Project impact area shall be	Prior to and during demolition and construction.	City of Glendale for retention of biologist. Retained biologist for construction monitoring.	Glendale Water and Power Environmental Coordinator	Biological monitoring and recordkeeping for each monitoring event.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	relocated by the authorized biologist to suitable habitat outside the impact area; relocation will be guided by the species specific list (or plan) as described further below in this measure. Surveys for special-status species shall be conducted by the authorized biologist prior to the initiation of construction each day prior to Project construction activities. Pre-construction clearance surveys should be conducted within the entirety of Project site. If nesting birds are found during the pre-construction surveys, buffers shall be installed (as prescribed in Mitigation Measure BIO-5 Conduct Pre-construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures discussed below. If, during construction, the biological monitor observes a dead or injured special-status wildlife species on the construction-site; the City of Glendale, CDFW, and USFWS (as appropriate) should be notified by the end of the work day or the following morning if the required agency office is closed. A written report shall be sent to the City of Glendale, CDFW, and USFWS (as appropriate) within three calendar					

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Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	days. The report will include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Injured animals will be taken immediately to the nearest appropriate veterinary or wildlife rehabilitation facility. The biological monitor shall, immediately upon finding the remains or injured animal, coordinate with the onsite construction foreman to discuss the events that caused the mortality or injury, if known, and implement measures to prevent future incidents. Details of these measures shall be included with the report. Work in the immediate area may only resume once the proper notifications have been made and additional measures have been identified to prevent additional injury or death. Species remains shall be collected and frozen as soon as possible, and CDFW and USFWS, as appropriate, shall be contacted regarding ultimate disposal of the remains. A qualified biologist should prepare a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas. The list (or					

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Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	plan) of protocols should be implemented during Project construction and activities/biological construction monitoring. The qualified biologist, in coordination or on behalf of the City, may consult with CDFW to prepare species-specific protocols for proper handling and relocation procedures.					
BIO-4	**BIO-4 Conduct Pre-construction Floristic Plant Surveys.** The City shall conduct two appropriately timed floristic surveys, following current CDFW and CNPS protocols, within the Project impact areas and within a 100-foot buffer in the spring/summer prior to the start of construction. Upon completion of the surveys a detailed report will be prepared and provided to the USFWS and/or CDFW for review; all occurrences of special-status species will be flagged in the field and GPS coordinates obtained for each individual or population. Prior to the start of construction activities (including vegetation removal) a qualified biologist(s) will conduct pre-construction surveys for State and federally Threatened, Endangered, Proposed, Petitioned, Candidate, and Special-status Plants and Avoid Any Located Occurrences of Listed Plants or	Prior to demolition and construction.	City of Glendale for retention of biologist. Retained biologist for construction monitoring.	Glendale Water and Power Environmental Coordinator	Biological monitoring and recordkeeping for each monitoring event.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	Perform other Conservation Strategy. The City of Glendale shall conduct focused surveys for federal- and state-listed and other special-status plants. All special-status plant species (including listed threatened or endangered species, and all CRPR 1A, 1B, 2, 3, and 4 species) subject to disturbance shall be documented in a pre-construction survey report. Surveys shall be conducted during the appropriate season in all suitable habitat located within the proposed Project disturbance areas and within 100 feet of disturbance areas and access roads and be conducted by a qualified botanist. The field surveys and reporting must conform to current CDFW botanical field survey protocols (CDFW, 2009) or more recent updates, if available. The report will describe any conditions that may have prevented target species from being located or identified, even if they are present as dormant seed or below-ground rootstock (e.g., poor rainfall, recent grazing, or wildfire). If federally or State-listed plants are detected in disturbance areas or within 100-feet of the disturbance areas, the City of Glendale would					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	avoid these populations and notify the USFWS and CDFW as appropriate. The City of Glendale shall avoid impacts to any State or federally listed plants to the extent feasible. If Project activities result in the loss of more than ten percent of the known individuals within a special-status plant species (List 3 and List 4 only) occurrence/population to be impacted, the City of Glendale shall consult with USFWS and CDFW regarding the most appropriate conservation strategy for the particular species being impacted.					
BIO-5	**BIO-5 Conduct Pre-construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures.** If feasible, conduct initial vegetation removal and construction activities that generate substantial noise and/or dust outside of the recognized nesting bird season to minimize potential direct impacts to nesting birds. Prior to construction activities during the recognized nesting bird season (i.e., mobilization, staging, grading, or construction) the City of Glendale shall retain a qualified avian biologist to conduct pre-	Prior to and during demolition and construction.	City of Glendale for retention of biologist. Retained biologist for construction monitoring.	Glendale Water and Power Environmental Coordinator	Biological surveys, monitoring, and recordkeeping for each survey/monitoring event.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	construction surveys for nesting birds within the recognized breeding season in all areas within 500 feet of all proposed Project components (i.e., pipelines, staging areas, and access road locations). Surveys for raptors shall be conducted for all areas from January 1 to August 15. The required survey dates may be modified based on local conditions, as determined by the qualified avian biologist, in coordination with CDFW and USFWS. Measures intended to exclude nesting birds shall not be implemented without prior approval by CDFW and USFWS. If breeding birds with active nests are found prior to or during construction, the qualified avian biologist shall establish a 300-foot buffer (500 foot for raptors) around the nest and no activities will be allowed within the buffer(s) until the young have fledged from the nest or the nest fails. The prescribed buffers may be adjusted by the qualified avian biologist in coordination with the USFWS and/or CDFW based on existing conditions around the nest, planned construction activities, tolerance of the species, and other pertinent factors. The qualified					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	avian biologist shall conduct regular monitoring of the nest to determine success/failure and to ensure that Project activities are not conducted within the buffer(s) until the nesting cycle is complete or the nest fails. The avian biologist shall be responsible for documenting the results of the surveys, nest buffers implemented, and the results of ongoing monitoring and will provide a copy of the monitoring reports for impact areas to the City of Glendale. Surveys shall be conducted to include all impact areas on the proposed Project site as well as all construction equipment. If birds are found to be nesting in facility structures or construction equipment and the nests contain eggs or young, buffers as described above shall be implemented. If trees with nests are to be removed as part of Project construction activities, this will be done outside of the nesting season to avoid additional impacts to nesting raptors. If removal during the nesting season cannot be avoided, all trees will be inspected for active nests by the avian biologist. If nests are found within these trees and contain eggs or young, no activities within a 300-					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	foot buffer for nesting birds and/or a 500-foot buffer for nesting raptors shall occur until the young have fledged the nest.					
BIO-6	**BIO-6 Conduct Surveys for Terrestrial Herpetofauna and Implement Monitoring, Avoidance, and Minimization Measures.** Prior to ground disturbance or vegetation clearing at all Project locations, the City of Glendale shall retain a qualified biologist to conduct surveys for terrestrial herpetofauna where suitable habitat is present and directly impacted by construction vehicle access. Surveys should place an emphasis towards identifying any Species of Special Concern (SSC) including (but not limited to) the southern California legless lizard; California glossy snake; coastal whiptail; coast horned lizard; and San Diego desert woodrat. Focused surveys shall consist of a minimum of three daytime surveys and one nighttime survey within one week of vegetation clearing. The qualified biologist will be present full time during all vegetation removal activities immediately adjacent to or within habitat that supports terrestrial herpetofauna, and part time for all remaining activities.	Prior to ground disturbance or vegetation clearing.	City of Glendale for retention of biologist. Retained biologist for biological surveys.	Glendale Water and Power Environmental Coordinator	Biological surveys and recordkeeping for each monitoring event.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	Surveys for terrestrial herpetofauna shall be conducted by the qualified biologist prior to the initiation of each day of vegetation removal activities in suitable habitat. Terrestrial herpetofauna found within the area of disturbance or potentially affected by the proposed Project will be relocated to the nearest suitable habitat that will not be affected by the proposed Project.					
BIO-7A	**BIO-7A Conduct Pre-Construction Maternity Colony or Hibernaculum Surveys for Sensitive Bats.** No more than 15 days prior to Project construction activities near trees, or which involve removal of trees or other structures, the City shall retain a qualified biologist who has a CDFW collection permit and a Memorandum of Understanding with CDFW allowing the biologist to handle bats. That biologist shall conduct pre-construction surveys for sensitive bats. Surveys shall also be conducted during the maternity season (1 March to 30 September) within 100 feet of Project activities. If active maternity roosts or hibernacula are found, the structure, tree or tower occupied by the roost shall be avoided (i.e., not	No more than 15 days prior to construction activities near trees, or which involve removal of trees or other structures.	City of Glendale for retention of biologist. Retained biologist for biological surveys.	Glendale Water and Power Environmental Coordinator	Biological surveys, reporting, and document review.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	removed), if feasible; work shall not occur within 100 feet of or directly under or adjacent to an active roost and work shall not occur between 30 minutes before sunset and 30 minutes after sunrise. If avoidance of the maternity roost is not feasible, the biologist shall survey (through the use of radio telemetry or other CDFW methods) for nearby alternative bat maternity colony sites. If the biologist determines in consultation with the CDFG that there are alternative roost sites used by the maternity colony and young are not present then no further action is required, and it will not be necessary to provide alternate roosting habitat. If there are no alternative roosts sites used by the maternity colony, BIO-7B is required. If no active roosts are found, then no further action is required. If active maternity roosts are absent, but a hibernaculum (i.e., a non-maternity roost) is present, then BIO-7B is not necessary, but BIO-7C is required.					
BIO-7B	**BIO-7B Provide Substitute Roosting Habitat for Bats**. If a maternity roost will be impacted by the Project, and no alternative maternity roosts are in use near the site, substitute roosting habitat for the maternity colony shall be	Within three months of impacting a maternity colony (if such event occurs during	City of Glendale	Glendale Water and Power Environmental Coordinator	Review and approval of substitute habitat replacement plan. Documentation demonstrating plan implemented.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	provided on, or in close proximity to, the Project site no less than three months prior to the eviction of the colony. Alternative roost sites will be constructed in accordance with the specific bat requirements in coordination with CDFW. By making the roosting habitat available prior to eviction (BIO-7C), the colony will have a better chance of finding and using the roost. Alternative roost sites must be of comparable size and proximal in location to the impacted colony. The CDFW shall also be notified of any hibernacula or active nurseries within the construction zone. If construction of alternative roost sites is required, the biologist shall provide a written report, documenting the required coordination with CDFW as well as the location of roost sites. This report shall be provided to CDFW.	demolition or construction.				
BIO-7C	**BIO-7C Exclude Bats Prior to Eviction from Roosts.** If non-breeding bat hibernacula are found (for the duration of construction activities) in structures or trees scheduled to be removed, the individuals shall be safely evicted, under the direction of a qualified biologist, by opening the roosting area to allow airflow through the cavity or other means determined	During demolition or construction.	City of Glendale for retention of biologist. Retained biologist for exclusion/eviction.	Glendale Water and Power Environmental Coordinator	Review and approval of substitute habitat replacement plan. Documentation demonstrating plan implemented.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	appropriate by the bat biologist (e.g., installation of one-way doors). In situations requiring one-way doors, a minimum of one week shall pass after doors are installed and temperatures should be sufficiently warm for bats to exit the roost because bats do not typically leave their roost daily during winter months in southern coastal California. This action should allow all bats to leave during the course of one week. Roosts that need to be removed in situations where, in the judgment of the qualified biologist, the use of one-way doors is not necessary shall first be disturbed by various means at the direction of the bat biologist at dusk to allow bats to escape during the darker hours, and the roost tree shall be removed or the grading shall occur the next day (i.e., there shall be no less or more than one night between initial disturbance and the grading or tree removal). If an active maternity roost is located in an area to be impacted by the Project, and alternative roosting habitat is available, the demolition of the roost site must commence before maternity colonies form (i.e., prior to March 1st) or after young are flying (i.e.,					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	after July 31st) using the exclusion techniques described above.					
BIO-8	**BIO-8 Vegetation Removal and Replacement.** Construction activities shall be done in such a manner as to minimize the removal of native vegetation. If impacts to native vegetation removal cannot be avoided, all temporarily impacted plant communities shall be restored at a mitigation ratio of 1:1; the Project will temporarily impact 0.16 acres of California sagebrush-California buckwheat scrub and 0.45 acres of laurel sumac scrub. The compensation for the permanent loss of habitats may be achieved either by a) on-site habitat creation or enhancement of impacted communities with similar species compositions to those present prior to construction, b) off-site creation or enhancement of laurel sumac scrub and California sagebrush-California buckwheat scrub communities, or c) participation in an established mitigation bank program. Permanent impacts to native communities shall be restored/mitigated at a 3:1 ratio for on or off-site habitat restoration/creation or at a 2:1 ratio for participation in an established mitigation banking program; the	During and after construction.	City of Glendale	Glendale Water and Power Environmental Coordinator	Review and approval of contractor construction plans prior to construction. Review and approval of restoration plan and documentation demonstrating plan implementation.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	Project will permanently impact 0.06 acres of California sagebrush-California buckwheat scrub and 2.76 acres of laurel sumac scrub. Prior to the start of any project related activities (including removal of native vegetation), if on or off-site mitigation is required, an ecosystem-based Habitat Mitigation and Monitoring Plan shall be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques that will guide all restoration and monitoring activities. This plan shall include, at a minimum, the following: • Provide the total acreage of unique sensitive vegetation communities impacted, and abundance, density, and cover of each plant species and vegetation layer impacted (i.e. ground cover, forbs, subshrub, shrub, and trees). • Provide the specific location of on- and/or off-site mitigation area(s) and a science based factual discussion as to why the mitigation area(s) is appropriate for mitigating Project-related impacts.					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	Describe the environmental features (i.e., soils, slope, existing vegetation, hydrology) that would suggest the mitigation area(s) can support the vegetation and wildlife impacted by Project activities. • Provide a vegetation survey conducted at a reference site containing the vegetation communities being mitigated, with as good or better quality habitat, to document the density, abundance, diversity, and percent cover for each species by vegetation layer. • A schematic depicting the mitigation area • Proposed species list for creation/enhancement. A plant palette shall consist of species that are diverse with respect to growing duration (annual, perennial), life form (grasses, shrubs, trees, vines), and structure (ground cover, shrubs, tree canopy) that form the vegetation alliance that is being mitigated.					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	• Planting/seeding methodology (e.g., sources of local propagules, container sizes, and seeding rates). • Planting schedule. • Irrigation plan. • Weeding schedule; and invasive plant control methods that reduces or eliminates the use of chemicals. • Success criteria. • Monitoring methodology and schedule extended across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought. • Reporting requirements. • Prior to any Project construction and activities, the perimeter of the 3.37 acres of laurel sumac scrub and California sagebrush-California buckwheat scrub be clearly delineated by temporary stakes, flags, or other clearly identifiable system. Fencing will be accompanied by signage. During WEAP, workers will be advised not to cut, clear,					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	pull, or trample vegetation; toss or pile debris and garbage; or otherwise impact vegetation beyond the demarcated area. Temporary fencing and signage should be maintained for the duration of the Project and removed after Project construction and activities are completed.					
HAZ-1	**HAZ-1: Worker Training.** Prior to construction, all construction-site workers will be trained to recognize and respond to spills as mandated by the required plans, including which authorities to contact. The crews will be supplied with, and trained in, the use of containment devices and spill kits which contain at a minimum sorbent booms and pads, personal protective equipment and detailed emergency response guidance. The workers will also be trained in the proper response to a small incidental spill and the proper procedures in the event of a spill or landfill gas leak as the proper containment and disposal procedures. Records of all training will be sent to the City at the end of each Project construction	Prior to construction.	City of Glendale	Glendale Water and Power Environmental Coordinator	Review and approval of worker training logs.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	phase along with a report detailing the training plans.					
HAZ-2	**HAZ-2: Maintain Equipment.** Prior to entry on the construction-site, and periodically during construction, all construction equipment will be inspected for line breakage and leakage. Any equipment found to be chronically or continuously leaking will be either immediately removed off site or repaired either in place or within the equipment service areas.	Prior to and during construction.	Construction Contractor	Glendale Water and Power Environmental Coordinator	Review of equipment inspection logs.	
HAZ-3	**HAZ-3: Equipment Service Areas.** The Applicant shall designate at least one Equipment Service Area prior to the beginning of construction. The Equipment Service Area shall have a corrosion-resistant secondary containment system installed around the facility. The secondary containment system shall meet the following requirements (at a minimum): • All hazardous materials (including fuel) must be stored either within the Equipment Service Area, or within their own secondary containment systems. • The system must be impervious, cover the entire Equipment Service Area, and free of cracks or gaps.	Prior to construction.	Construction Contractor	Glendale Water and Power Environmental Coordinator	Review and approval of contractor Equipment Service Area.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	• All primary containers shall be elevated above the surface of the secondary containment area. • The secondary containment systems shall have sufficient capacity to contain at least 15 percent of the total volume of the primary containers or 110 percent of the volume of the largest container, whichever is greater. • Precipitation or run-on must be prevented from entering the secondary containment system, unless the system has sufficient capacity to contain any run-on in addition to the volume capacity requirement. All waste (such as spills, leaks, or run-on) that accumulates in the secondary containment area must be removed and disposed of as soon as possible.					
HAZ-4	**HAZ-4: Refueling Practices.** Absorbent material such as secondary containment, pads, or drip pans will be placed underneath all vehicles and equipment during equipment refueling or maintenance. Refueling shall be performed within equipment service areas, parking areas, and gas and	During construction.	Construction Contractor	Glendale Water and Power Environmental Coordinator	Periodic monitoring/site audits.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	oil storage areas whenever possible. Any refueling activity on the site must also be conducted at least 100 feet (30.5 meters) from all designated drainages or areas of native vegetation. Any and all fluids drained from equipment will be collected in leak-proof containers and disposed of at an appropriate recycling facility if possible. If no recycling facility is available, an appropriate disposal facility may be used.					
FIRE-1	**FIRE-1: Fire Protection Plan.** The Applicant shall prepare a construction phase Fire Protection Plan. The Plan shall contain, but not be limited to, the following provisions: 1. Comply with all applicable laws of the State of California and the Fire Prevention Plan. Ensure that a copy of this Fire Prevention Plan and any special permits are to be known and in possession of Project foreman/supervisor on work site daily. 2. A full-time fire watch with appropriately trained personnel and appropriate fire-fighting equipment shall be available and on-site during all times when	Prior to demolition and construction.	Demolition and Construction Contractor	Glendale Water and Power Environmental Coordinator	Review and approval of Fire Protection Plan.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	construction work is taking place. The Applicant shall designate a qualified on-site fire supervisor during Project construction to implement the Fire Protection Plan. Fire Watch personnel shall be responsible for patrolling the construction work area for the prevention and detection of fires, and to make sure all fire regulations and fire prevention plans are met, and to take/direct suppression action where necessary. The Fire Watch personnel shall not be permitted to perform other non-fire-related duties. Fire Watch personnel shall remain on duty for at least one hour after the close of work or sunset (whichever comes first). 3. All construction equipment shall be fitted with appropriate spark arrestors. Spark arrestors shall meet the standards set forth in the National Wildfire Coordinating Group publication for Multi-position Small Engines, #430-1, or					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	General Purpose and Locomotive, #430-2. 4. Unless determined appropriate by the GFD spark arrestors are not required on equipment powered by exhaust-driven turbo charged engines or motor vehicles equipped with a maintained muffler. 5. All construction vehicles and equipment shall carry at least one fully charged fire extinguisher. Fire extinguishers shall be of the type and size set forth in the California PRC Section 4431. Fire extinguishers shall be appropriately maintained throughout construction. The following conditions shall also be incorporated: i. Each truck, personnel vehicle, tractor, grader or piece of heavy equipment shall have one shovel, one axe (or Pulaski) and a fully charged fire extinguisher. ii. Each welder shall have one shovel and one five-gallon water-					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	filled tank with pump. Shovel and five-gallon water-filled tank with pump must be kept within 25 feet of tools when in use. iii. Each gasoline powered tool (such as chainsaws, chippers, rock drills, etc.) shall have one shovel and one pressurized fire extinguisher. Shovels must be kept within 25 feet of tools when in use. iv. All tools and equipment above shall be in good workable conditions, with employee's trained on their use. v. Shovels shall be "O" or larger and be not less than 46 inches in over length. vi. Axes (or Pulaskis) shall have 2.5-pound or larger heads and be not less than 28 inches in overall length 6. Confine welding activities to areas having a minimum					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	radius of ten feet cleared to mineral soil, wet down an area of 25 feet in all directions from the center of welding operations with a 0.3 percent Class A Foam Solution, utilize a welding tent or metal shield where possible to deflect sparks. Fire Watch shall be on standby during welding activities with fire prevention tools including fire extinguishers, shovels, immediate access to a minimum of five gallons of water equipped with a dispensing application. Welding or other hot work shall not occur during red flag events. 7. Refueling shall be performed within previously developed areas a minimum of 25 feet from areas with substantial vegetation or potential ignition source. The Applicant shall participate in the Red Flag Warning program with local fire agencies and the National Weather Service. The Applicant shall stop work during Red Flag conditions. If a Red Flag Warning were to occur during critical work					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	activities, or work activities that cannot be stopped (such as a heavy lift), the GFD shall be immediately notified. Communication protocols shall be outlined in the plan. The GFD shall approve resumption of construction activities.					
FIRE-2	**FIRE-2: Smoking and Open Fires.** Smoking and open fires shall be prohibited for all Project personnel at the site during construction. A copy of the notification prohibiting smoking and fires shall be posted at the construction work areas and included in the worker trainings. This notice shall be provided to the GFD within five business days, upon their request.	During construction.	Demolition and Construction Contractor	Glendale Water and Power Environmental Coordinator	Review and approval of WEAP training that includes prohibition of smoking and open fires.	
FIRE-3	**FIRE-3: Firefighting Water Supply.** The Applicant shall furnish a water truck or trailer on or immediately adjacent to the proposed Project area during construction specifically for firefighting water supply. Fire watch personnel shall be trained on how to access these water tanks in the event of a fire-related incident. The Applicant shall maintain and provide appropriate firefighting equipment to access the water, such as hoses or wrenches. The truck or trailer shall meet the following minimum specifications:	During construction.	Construction Contractor	Glendale Water and Power Environmental Coordinator	Review and approval of firewater supply plan.	

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	• Water truck and operator must be ready to put fires out at all times • Water truck or trailer shall contain or meet the following specifications: o At least 300 gallons of water o A combination straight stream and fog nozzle with 300 feet of one-inch fire hose, with no segment longer than 50 feet o Fire hose with nozzle closed shall be capable of withstanding 200 psi pump pressure without leaking, slipping or couplings, distortions, or other failures o Nozzle discharge rating of six to 20 gallons per minute o A Pump capable of delivering 23 gallons per minute at 175 pounds psi at sea level o Power unit for pump shall have fuel for at least two hours of operation, be in good working order, with ample transport available for immediate					

MITIGATION MONITORING AND REPORTING PLAN

Mitigation Measure	Monitoring Action	Required Time of Compliance	Implementation Responsibility	Verification Responsibility	Verification Method	Compliance Date
	safe movement of tank over roads serving the project area; pump outlet shall be equipped with 1.5-inch National Standard Fire Hose thread o The Water Truck or Trailer MAY NOT be used for other work on the contract o If the proposed Project area in inaccessible to water truck or trailer accessibility, a charged hose capable of reaching 100 feet beyond the proposed Project area is required.					

ATTACHMENTS

Errata Attachment A: Updated Project Emission Inventory

CRITERIA POLLUTANTS EMISSION INVENTORY

EMISSION FACTORS OF THE EMISSION SOURCES
BIOGAS RENEWABLE GENERATION PROJECT

	CONTROLLED EMISSION RATES														
Equipment Type	NO_X		CO		VOC		PM10/2.5		SO_X		NO_X, LBS/HR	CO, LBS/HR	VOC, LBS/HR	PM10/2.5, LBS/HR	SO_X, LBS/HR
GE J 620 GS-F21 (Engine)	11	PPMV	130.1	PPMV	30	PPMV	0.066	g/bhp-hr	10.13	LBS/MMCF	1.22	8.8	1.16	0.61	0.84
Existing Flare System	13.27	LBS/MMCF	1.19	LBS/MMCF	1.3	LBS/MMCF	6.4	LBS/MMCF	5.21	LBS/MMCF					
Regen Flare System	0.025	LBS/MMBTU	0.06	LBS/MMBTU	0.038	LBS/MMBTU	6.1	LBS/MMCF	10.13	LBS/MMCF					
	UNCONTROLLED EMISSION RATES														
GE J 620 GS-F21 (Engine)	66	PPMV	250	PPMV	56	PPMV	0.066	g/bhp-hr	10.13	LBS/MMCF	7.34	16.92	2.17	0.61	0.84

NOTES:

GE J 620 GS-F21 Engine:
- NO_X and VOC emission concentration based on Rule 1110.2 Emission Limits (SCAQMD BACT/LAER).
- CO emission based on manufacturer emission guarantee.
- PM10 emission factor is based on SCAQMD BACT/LAER emission limit.
- SO_X emission factor based on 60 ppmv of sulfur content measured in H2S for Landfill gas (SCAQMD BACT/LAER).
- Enigne parameter is based provided by the manufacturer.
- Landfill gas HHV is estimated based on the landfill gas sampling on 01/06/2016.

Existing Flare System:
- Emission factors is the average of calculated emission factors reported in SCAQMD Annual Emission Report (AER) for the reporting year 2010 through 2014 and Source test concducted on May, 2015.

Regen Flare System:
- NOX, CO, VOC emission factors are based on Rule 1118.1
- PM10 emission factor is based on LACSD permit application number A/N 245157
- SO_X emission factor based on 60 ppmv of sulfur content measured in H2S for Landfill gas (SCAQMD BACT/LAER).

Landfill gas property:
-Landfill gas HHV is estimated based on the current sampling.
-Dry Fuel Factor is estimated based on the average heating values from the lab results sampled from 2010 through May, 2015.

EMISSION INVENTORY FOR THE EMISSION SOURCES
BIOGAS RENEWABLE GENERATION PROJECT

GE J 620 GS-F21 **30 MINUTES STARTUP, 8 MINUTES SHUTDOWN**

Pollutant	No. of Normal Operating Hours per Day	Normal Operating Hour Emission Rate	No. of Startups Per Day	Uncontrolled Emission lb / Startup	No. of Shutdowns Per Day	Uncontrolled Emission lb / Shutdown	No. of Maintenance Operating Hours per Day	Maintenance Operating Hour Emission Rate	Number of Startups/ Shutdowns per Month	Number of Normal Operating Hours Per Month	Number of Startups/ Shutdowns per Year	Number of Normal Operating Hours Per Year
NO_X	12.73	1.22	2	23.50	2.00	7.40	10	7.34	10	704	120	8674
CO	12.73	8.80	2	24.00	2.00	29.20	10	16.92	10	704	120	8674
VOC	12.73	1.16	2	1.20	2.00	0.46	10	2.17	10	704	120	8674
PM10	12.73	0.61	2	0.30	2.00	0.08	10	0.61	10	704	120	8674
SO_X	12.73	0.84	2	0.42	2.00	0.11	10	0.84	10	704	120	8674

Starts/stops =	1.27	hours/day per engine	6.33	hours/month per engine	76.00	Hours / year per engine
Maintenance =	10	hours/day per engine	10	hours/month per engine	10	Hours / year per engine

Daily = 24 hours with 2 startS Monthly = 720 hours with 10 starts

GE J 620 GS-F21 **EMISSIONS OF 1 ENGINE** **EMISSIONS OF 4 ENGINES**

Pollutant	Daily Maximum Emissions (Lbs)	Monthly Maximum Emissions (Lbs)	30-Day Average Emissions (lbs)	Annual PTE (Lbs)	Annual PTE (Tons)	Daily Maximum Emissions (Lbs)	Monthly Maximum Emissions (Lbs)	30-Day Average Emissions (lbs)	Annual PTE (Lbs)	Annual PTE (Tons)
NO_X	150.73	1,241	41	14,364	7.18	419.34	4,963	165	57,455	28.73
CO	387.65	6,893	230	82,884	41.44	1131.81	27,574	919	331,538	165.77
VOC	39.79	855	28	10,283	5.14	126.10	3,418	114	41,131	20.57
PM10	14.61	438	15	5,332	2.67	57.94	1,753	58	21,327	10.66
SO_X	20.16	605	20	7,358	3.68	79.97	2,419	81	29,434	14.72

*Maximum 1 Engine per day in the maintenance operation

EMISSION INVENTORY FOR THE EXISTING FLARE SYSTEM
BIOGAS RENEWABLE GENERATION PROJECT

LFG COMBUSTED: **0.06848 MMSCF/HR** **1141.36 SCF/MIN** **EACH FLARE** **860** **SCF/MIN**
ANNUAL OPERATING HOURS: **8760**

FLARE SYSTEM

Pollutant	No. of Normal Operating Hours per Day	Emission Factor, lbs/mmscf	Number of Normal Operating Hours Per Month	Number of Normal Operating Hours Per Year
NO_X	24.00	13.27	720	8760
CO	24.00	1.19	720	8760
VOC	24.00	1.30	720	8760
PM10	24.00	6.40	720	8760
SO_X	24.00	5.21	720	8760

FLARE SYSTEM

Pollutant	Daily Maximum Emissions (Lbs)	Monthly Maximum Emissions (Lbs)	30-Day Average Emissions (lbs)	Annual PTE (Lbs)	Annual PTE (tons)
NO_X	21.81	654	22	7,961	3.980
CO	1.96	59	2	714	0.357
VOC	2.14	64	2	780	0.390
PM10	10.52	316	11	3,839	1.920
SO_X	8.56	257	9	3,125	1.563

EMISSION INVENTORY FOR THE REGEN FLARE SYSTEM
BIOGAS RENEWABLE GENERATION PROJECT

LFG COMBUSTED: **5 MMBTU/HR**
0.0138 MMCF/HR **229.19 SCF/MIN**

ANNUAL OPERATING HOURS: **8760**

REGEN FLARE SYSTEM

Pollutant	No. of Normal Operating Hours per Day	Emission Factor	Unit of Measurement	Number of Normal Operating Hours Per Month	Number of Normal Operating Hours Per Year
NO_X	24.00	0.025	lbs/mmbtu	720	8760
CO	24.00	0.060	lbs/mmbtu	720	8760
VOC	24.00	0.038	lbs/mmbtu	720	8760
PM10	24.00	6.10	lbs/mmcf	720	8760
SO_X	24.00	10.13	lbs/mmcf	720	8760

REGEN FLARE SYSTEM

Pollutant	Daily Maximum Emissions (Lbs)	Monthly Maximum Emissions (Lbs)	30-Day Average Emissions (lbs)	Annual PTE (Lbs)	Annual PTE (tons)
NO_X	3.00	90	3	1,095	0.548
CO	7.20	216	7	2,628	1.314
VOC	4.56	137	5	1,664	0.832
PM10	2.01	60	2	735	0.367
SO_X	3.34	100	3	1,220	0.610

TOXICS EMISSION INVENTORY

TOXIC EMISSION INVENTORY FOR EMISSION SOURCES
BIOGAS RENEWABLE GENERATION PROJECT

										PROPOSED ENGINES		EXISTING FLARES SYSTEM		PROPOSED REGEN FLARE	
TAC Code	Toxid Air Contaminants (TAC) Compounds	CAS	MW	Conc., ppmv	Data Source	ICE Total Control Efficiency (% wt)[6]	ICE Controlled Emission Rate (lbs/mmscf)	Flare Destruction Efficiency (% wt)[5]	Flare Controlled Emission Rate (lbs/mmscf)	Hourly Emission (lbs/hr)	Yearly Emission (lbs/yr)	Hourly Emission (lbs/hr)	Yearly Emission (lbs/yr)	Hourly Emission (lbs/hr)	Yearly Emission (lbs/yr)
M8	1,1,1 - Trichloroethane	71-55-6	133.41	0.021	Note 1	99.8%	1.17E-05	98%	1.45E-04	3.87E-06	0.0339	9.92E-06	0.0869	1.99E-06	0.0174
T1	1,1,2,2 - Tetrachloroethane	79-34-5	167.85	1.11	Note 2	99.8%	7.75E-04	98%	9.63E-03	2.57E-04	2.2542	6.59E-04	5.7762	1.32E-04	1.1599
E5	1,2 - Dibromoethane	106-93-4	187.86	0.041	Note 1	99.8%	3.20E-05	98%	3.98E-04	1.06E-05	0.0932	2.73E-05	0.2388	5.47E-06	0.0479
D6	1,1 - Dichloroethane	75-34-3	98.97	0.039	Note 1	99.8%	1.61E-05	98%	1.99E-04	5.33E-06	0.0467	1.37E-05	0.1197	2.74E-06	0.0240
V5	1,1 - Dichloroethene	75-35-4	96.94	0.019	Note 1	99.8%	7.66E-06	98%	9.52E-05	2.54E-06	0.0223	6.52E-06	0.0571	1.31E-06	0.0115
E6	1,2 - Dichloroethane	107-06-2	98.96	0.102	Note 1	99.8%	4.20E-05	98%	5.22E-04	1.39E-05	0.1221	3.57E-05	0.3129	7.17E-06	0.0628
	1,2 - Dichloropropane	78-87-5	112.99	0.18	Note 2	99.8%	8.46E-05	98%	1.05E-03	2.81E-05	0.2461	7.20E-05	0.6305	1.45E-05	0.1266
I2	2 - Propanol	67-63-0	60.11	50.1	Note 2	99.7%	2.49E-02	98%	1.56E-01	8.26E-03	72.3533	1.07E-02	93.3648	2.14E-03	18.7479
	Acetonitrile	75-05-8	58.08	0.665	Note 1	99.7%	3.19E-04	98%	2.00E-03	1.06E-04	0.9279	1.37E-04	1.1974	2.74E-05	0.2404
A6	Acrylonitrile	107-31-1	53.06	6.33	Note 2	99.7%	2.77E-03	98%	1.74E-02	9.21E-04	8.0695	1.19E-03	10.4128	2.39E-04	2.0909
A9	Ammonia	7664-41-7	17.03	5	Note 7					2.70E-01	2365.20	0.00E+00	0.0000	0.00E+00	0.0000
B1	Benzene	71-43-2	78.11	1.71	Note 1	99.7%	1.10E-03	98%	6.90E-03	3.66E-04	3.2091	4.73E-04	4.1410	9.49E-05	0.8315
B7	Benzyl chloride	100-44-7	126.58	0.13	Note 1	99.8%	6.85E-05	98%	8.50E-04	2.27E-05	0.1991	5.82E-05	0.5102	1.17E-05	0.1024
C3	Carbon disulfide	75-15-0	76.13	0.58	Note 1	99.7%	3.65E-04	98%	2.28E-03	1.21E-04	1.0609	1.56E-04	1.3689	3.14E-05	0.2749
C5	Carbon tetrachloride	56-23-5	153.84	0.021	Note 1	99.8%	1.34E-05	98%	1.67E-04	4.46E-06	0.0391	1.14E-05	0.1002	2.30E-06	0.0201
	Carbonyl sulfide	463-58-1	60.07	0.49	Note 1	99.7%	2.43E-04	98%	1.52E-03	8.07E-05	0.7072	1.04E-04	0.9125	2.09E-05	0.1832
C10	Chlorobenzene	108-90-7	112.56	0.159	Note 1	99.8%	7.45E-05	98%	9.25E-04	2.47E-05	0.2165	6.33E-05	0.5549	1.27E-05	0.1114
	Chlorodifluoromethane	75-45-6	86.47	1.3	Note 2	99.8%	4.68E-04	98%	5.81E-03	1.55E-04	1.3601	3.98E-04	3.4850	7.99E-05	0.6998
E4	Chloroethane	75-00-3	64.52	1.25	Note 2	99.8%	3.36E-04	98%	4.17E-03	1.11E-04	0.9758	2.85E-04	2.5004	5.73E-05	0.5021
C11	Chloroform	67-66-3	119.39	0.02	Note 1	99.8%	9.93E-06	98%	1.23E-04	3.30E-06	0.0289	8.45E-06	0.0740	1.70E-06	0.0149
	Chloromethane	74-87-3	50.49	1.21	Note 2	99.8%	2.54E-04	98%	3.16E-03	8.44E-05	0.7392	2.16E-04	1.8940	4.34E-05	0.3803
D4	Dichlorobenzene	106-46-7	147	0.82	Note 1	99.8%	5.01E-04	98%	6.23E-03	1.66E-04	1.4584	4.27E-04	3.7371	8.57E-05	0.7504
	Dichlorodifluoromethane	75-71-8	120.91	15.7	Note 2	99.8%	7.90E-03	98%	9.81E-02	2.62E-03	22.9678	6.72E-03	58.8519	1.35E-03	11.8177
	Dichlorofluoromethane	75-43-4	102.92	2.62	Note 2	99.8%	1.12E-03	98%	1.39E-02	3.72E-04	3.2626	9.54E-04	8.3599	1.92E-04	1.6787
M13	Dichloromethane (methylene chloride)	74-87-3	84.94	0.119	Note 1	99.8%	4.21E-05	98%	5.22E-04	1.40E-05	0.1223	3.58E-05	0.3134	7.18E-06	0.0629
P29	Dioxin and Furans	3268-87-9	5.33E-10	lbs/mmcf	Note 8		0.00E+00	0%	5.33E-10	0.00E+00	0.0000	3.65E-11	3.20E-07	7.33E-12	6.42E-08
E3	Ethylbenzene	100-41-4	106.16	2.748	Note 2	99.7%	2.41E-03	98%	1.51E-02	8.00E-04	7.0089	1.03E-03	9.0443	2.07E-04	1.8161
E5	Ethylene dibromide	106-93-4	187.88	0.001	Note 2	99.8%	7.82E-07	98%	9.71E-06	2.59E-07	0.0023	6.65E-07	0.0058	1.34E-07	0.0012
F2	Formaldehyde	50-00-0	NA	NA	Note 4	97.7%	2.97E-02	0%	1.17E+00	9.85E-03	86.2899	8.01E-02	701.2843	1.61E-02	140.8201
	Fluorotrichloromethane	75-69-4	137.38	0.76	Note 2	99.8%	4.34E-04	98%	5.40E-03	1.44E-04	1.2633	3.70E-04	3.2369	7.42E-05	0.6500
H6	Hexane, n-	110-54-3	86.18	6.57	Note 2	99.7%	4.68E-03	98%	2.93E-02	1.55E-03	13.6033	2.00E-03	17.5538	4.02E-04	3.5249
H9	Hydrogen chloride	7647-01-0	36.46	NA	Note 3	NA	5.35E+00	NA	5.35E+00	1.78E+00	15559.5	3.66E-01	3209.5	7.36E-02	644.5
H12	Hydrogen sulfide	7783-06-4	34.08	33.65	Note 1	99.7%	9.47E-03	98%	5.93E-02	3.15E-03	27.5523	4.06E-03	35.5536	8.15E-04	7.1393
M3	Mercury (total)	7439-97-6	200.61	0.00029	Note 2	0.0%	1.51E-04	0%	1.51E-04	5.03E-05	0.4402	1.04E-05	0.0908	2.08E-06	0.0182
M9	Methyl ethyl ketone	78-93-3	72.11	7.09	Note 2	99.7%	4.22E-03	98%	2.64E-02	1.40E-03	12.2833	1.81E-03	15.8504	3.63E-04	3.1828
	Methyl isobutyl ketone	108-10-1	100.16	1.87	Note 2	99.7%	1.55E-03	98%	9.68E-03	5.14E-04	4.5000	6.63E-04	5.8068	6.63E-04	5.8068
P2	Tetrachloroethylene	127-18-4	165.83	0.154	Note 1	99.8%	1.06E-04	98%	1.32E-03	3.53E-05	0.3090	9.04E-05	0.7917	9.04E-05	0.7917
T3	Toluene	108-88-3	92.14	5.436	Note 1	99.7%	4.14E-03	98%	2.59E-02	1.37E-03	12.0338	1.77E-03	15.5284	1.77E-03	15.5284
T8	Trichloroethylene	79-01-6	131.4	0.089	Note 1	99.8%	4.87E-05	98%	6.04E-04	1.62E-05	0.1415	4.14E-05	0.3626	4.14E-05	0.3626
V4	Vinyl chloride	75-01-4	62.5	0.093	Note 1	99.8%	2.42E-05	98%	3.00E-04	8.03E-06	0.0703	2.06E-05	0.1802	2.06E-05	0.1802
X1	Xylenes	1330-20-7	106.16	4.828	Note 1	99.7%	4.23E-03	98%	2.65E-02	1.41E-03	12.3141	1.81E-03	15.8901	1.81E-03	15.8901

Notes:
1. Average analytical results from Scholl Canyon LFG Sampling 2013 - 2016
2. Based on USEPA default value from *AP-42, Table 2.4-1, Default Concentrations for LFG Constituents* .
3. Calculated based on chlorinated compounds in the average samplings and USEPA AP-42 default value, Table 2.4-1
4. Formaldehyde emission factors for tubine and engine are based on the CATEF Clearing house Report; Formaldehyde emission factor for flare is based on SCAQMD AB2588 Supplemental Instruction.
5. 98% Destruction efficiency of NMOC pursuant to SCAQMD rule 1150.1/NSPS Subpart WWW
6. ICE Control efficiency is calculated based on 97.7% control efficiency of catalyst (default value of SCAQMD Rule 1401 Calculator) and 86.1% or 93.0% control efficiency of ICE (USEPA AP-42, Table 2.4-3). The overall control efficiency is calculated as follow: Overall Control Efficiency = 1-(1-CE of catalyst)*(1-CE of ICE).
7. Ammonia emissions occur in operating IC Engines due to SCR. Concentration of ammonia is based on BACT/LAER limit.
8. Emission factor of dioxin and furans is based on the source test conducted on landfill gas combustion in the boiler at Grayson power plant.

EMISSION FACTOR FOR HYDROGEN CHLORIDE EMISSIONS
SCHOLL CANYON LANDFILL GAS FACILITY

Hydrogen Chloride Emission Factor	5.35	lbs/mmcf
Hydrogen Chloride Molecular Weight	36.46	lb/mol

LFG Influent Chlorinated Compound	CAS	No. of Cl Atoms	Concentration, ppmv	Conversion Eff, (%Wt)	HCL Conversion, lb/mmcf
1,1,1 - Trichloroethane	71-55-6	3	0.021	100%	0.005935349
1,1,2,2 - Tetrachloroethane	79-34-5	4	1.11	100%	0.418300775
1,1 - Dichloroethane	75-34-3	2	0.039	100%	0.007348527
1,1 - Dichloroethene	75-35-4	2	0.019	100%	0.003580052
1,2 - Dichloroethane	107-06-2	2	0.102	100%	0.019219225
1,2 - Dichloropropane	78-87-5	2	0.18	100%	0.033916279
Benzyl chloride	100-44-7	1	0.13	100%	0.012247545
Carbon tetrachloride	56-23-5	4	0.021	100%	0.007913798
Chlorobenzene	108-90-7	1	0.159	100%	0.01497969
Chlorodifluoromethane	75-45-6	1	1.3	100%	0.122475452
Chloroethane	75-00-3	1	1.25	100%	0.117764858
Chloroform	67-66-3	3	0.02	100%	0.005652713
Chloromethane	74-87-3	1	1.21	100%	0.113996382
Dichlorobenzene	106-46-7	2	0.82	100%	0.154507494
Dichlorodifluoromethane	75-71-8	2	15.7	100%	2.95825323
Dichlorofluoromethane	75-43-4	2	2.62	100%	0.493670284
Dichloromethane (methylene chloride)	74-87-3	2	0.119	100%	0.022422429
Fluorotrichloromethane	75-69-4	3	0.76	100%	0.214803101
t-1,2-dichloroethene	156-59-2	2	2.84	100%	0.535123514
Tetrachloroethylene	127-18-4	4	0.154	100%	0.058034522
Trichloroethylene	79-01-6	3	0.089	100%	0.025154574
Vinyl chloride	75-01-4	1	0.093	100%	0.008761705

Errata Attachment B: Updated Project Air Quality Model Input / Output

MODELING INPUT INFORMATION

Point Sources - 1 Hour Model

Model ID	Source Description	UTME (m)	UTMN (m)	Elevation (m)	Stack Height (m)	Temperature (K)	Exit Velocity (m/s)	Stack Dia. (m)	NOx Emission (g/s)	CO Emission (g/s)	SO2 Emission (g/s)	PM Emission (g/s)
ENGINE1	Generator 1	390140.0	3779830.2	436.27	12.192	698.150	32.504	0.6096	3.94968	7.10960	0.10584	
ENGINE2	Generator 2	390147.2	3779828.8	437.82	12.192	698.150	32.504	0.6096	0.15372	1.10878	0.10584	
ENGINE3	Generator 3	390154.5	3779827.5	440.51	12.192	698.150	32.504	0.6096	0.15372	1.10878	0.10584	
ENGINE4	Generator 4	390161.7	3779827.4	443.05	12.192	698.150	32.504	0.6096	0.15372	1.10878	0.10584	
REGEN	Regen Flare	390047.3	3779809.2	429.86	8.534	1033.150	3.359	1.2192	0.01575	0.03780	0.01755	
FLARE12	Existing Flare 12	390039.6	3779808.2	429.97	4.877	1051.210	2.243	2.4384	0.11450	0.01027	0.04495	

Point Sources - 3 Hour Model

Model ID	Source Description	UTME (m)	UTMN (m)	Elevation (m)	Stack Height (m)	Temperature (K)	Exit Velocity (m/s)	Stack Dia. (m)	NOx Emission (g/s)	CO Emission (g/s)	SO2 Emission (g/s)	PM Emission (g/s)
ENGINE1	Generator 1	390140.0	3779830.2	439.40	12.192	698.150	32.504	0.6096			0.10584	
ENGINE2	Generator 2	390147.2	3779828.8	439.40	12.192	698.150	32.504	0.6096			0.10584	
ENGINE3	Generator 3	390154.5	3779827.5	439.40	12.192	698.150	32.504	0.6096			0.10584	
ENGINE4	Generator 4	390161.7	3779827.4	439.40	12.192	698.150	32.504	0.6096			0.10584	
REGEN	Regen Flare	390047.3	3779809.2	429.86	8.534	1033.150	3.359	1.2192			0.01755	
FLARE12	Existing Flare 12	390039.6	3779808.2	429.97	4.877	1051.210	2.243	2.4384			0.04495	

Point Sources - 8 Hour Model

Model ID	Source Description	UTME (m)	UTMN (m)	Elevation (m)	Stack Height (m)	Temperature (K)	Exit Velocity (m/s)	Stack Dia. (m)	NOx Emission (g/s)	CO Emission (g/s)	SO2 Emission (g/s)	PM Emission (g/s)
ENGINE1	Generator 1	390140.0	3779830.2	439.40	12.192	698.150	32.504	0.6096		3.37631		
ENGINE2	Generator 2	390147.2	3779828.8	439.40	12.192	698.150	32.504	0.6096		1.10878		
ENGINE3	Generator 3	390154.5	3779827.5	439.40	12.192	698.150	32.504	0.6096		1.10878		
ENGINE4	Generator 4	390161.7	3779827.4	439.40	12.192	698.150	32.504	0.6096		1.10878		
REGEN	Regen Flare	390047.3	3779809.2	429.86	8.534	1033.150	3.359	1.2192		0.03780		
FLARE12	Existing Flare 12	390039.6	3779808.2	429.97	4.877	1051.210	2.243	2.4384		0.01027		

Point Sources - 24 Hour Model

Model ID	Source Description	UTME (m)	UTMN (m)	Elevation (m)	Stack Height (m)	Temperature (K)	Exit Velocity (m/s)	Stack Dia. (m)	NOx Emission (g/s)	CO Emission (g/s)	SO2 Emission (g/s)	PM Emission (g/s)
ENGINE1	Generator 1	390140.0	3779830.2	439.40	12.192	698.150	32.504	0.6096			0.10584	0.07669
ENGINE2	Generator 2	390147.2	3779828.8	439.40	12.192	698.150	32.504	0.6096			0.10584	0.07669
ENGINE3	Generator 3	390154.5	3779827.5	439.40	12.192	698.150	32.504	0.6096			0.10584	0.07669
ENGINE4	Generator 4	390161.7	3779827.4	439.40	12.192	698.150	32.504	0.6096			0.10584	0.07669
REGEN	Regen Flare	390047.3	3779809.2	429.86	8.534	1033.150	3.359	1.2192			0.01755	0.01057
FLARE12	Existing Flare 12	390039.6	3779808.2	429.97	4.877	1051.210	2.243	2.4384			0.04495	0.05522

Point Sources - Annual Model

Model ID	Source Description	UTME (m)	UTMN (m)	Elevation (m)	Stack Height (m)	Temperature (K)	Exit Velocity (m/s)	Stack Dia. (m)	NOx Emission (g/s)	CO Emission (g/s)	SO2 Emission (g/s)	PM Emission (g/s)
ENGINE1	Generator 1	390140.0	3779830.2	439.40	12.192	698.150	32.504	0.6096	0.20660		0.10584	0.07669
ENGINE2	Generator 2	390147.2	3779828.8	439.40	12.192	698.150	32.504	0.6096	0.20660		0.10584	0.07669
ENGINE3	Generator 3	390154.5	3779827.5	439.40	12.192	698.150	32.504	0.6096	0.20660		0.10584	0.07669
ENGINE4	Generator 4	390161.7	3779827.4	439.40	12.192	698.150	32.504	0.6096	0.20660		0.10584	0.07669
REGEN	Regen Flare	390047.3	3779809.2	429.86	8.534	1033.150	3.359	1.2192	0.01575		0.01755	0.01057
FLARE12	Existing Flare 12	390039.6	3779808.2	429.97	4.877	1051.210	2.243	2.4384	0.11450		0.04495	0.05522

AQIA RESULTS
(SHORT-TERM & ANNUAL)

Description	Pollutant	Averaging Period	Highest	Source Group	Conc (ug/m3)	UTME	UTMN	Conc Date mm/dd/yy/hh	Conc (ppm)	Background	Unit	Total	Unit	NAAQS	Unit	SCAQMD	Unit
CO State Standard/NAAQS																	
Scholl Canyon CO ICE 1hr Model	CO	1-HR	1ST	ALL	192.31	390407.0	3779876.0	04/25/14/20	0.17476	2.6	PPM	2.7748	PPM	35	PPM	20	PPM
				ENGINE1	128.87	390407.0	3779876.0	04/25/14/20	0.11712			2.7171	PPM				
				ENGINE2	20.48	390407.0	3779876.0	04/25/14/20	0.01861			2.6186	PPM				
				ENGINE3	20.84	390407.0	3779876.0	04/25/14/20	0.01894			2.6189	PPM				
				ENGINE4	21.31	390407.0	3779876.0	04/25/14/20	0.01937			2.6194	PPM				
				REGEN	0.85	390419.6	3779834.2	12/12/15/04	0.00077			2.6008	PPM				
				FLARE12	0.21	390419.6	3779834.2	04/13/12/18	0.00019			2.6002	PPM				
Scholl Canyon CO ICE 8hr Model	CO	8-HR	1ST	ALL	52.05	390419.6	3779834.2	03/06/16/16	0.04731	1.6	PPM	1.6473	PPM	9	PPM	9	PPM
				ENGINE1	25.23	390419.6	3779834.2	03/06/16/16	0.02293			1.6229	PPM				
				ENGINE2	8.52	390419.6	3779834.2	03/06/16/16	0.00774			1.6077	PPM				
				ENGINE3	8.75	390419.6	3779834.2	03/06/16/16	0.00796			1.6080	PPM				
				ENGINE4	9.41	390419.6	3779834.2	03/18/12/16	0.00855			1.6086	PPM				
				REGEN	0.49	389664.0	3779939.0	05/25/12/24	0.00045			1.6004	PPM				
				FLARE12	0.11	390067.2	3779358.3	03/07/12/08	0.00010			1.6001	PPM				
NO_2 State Standard - ARM2																	
Scholl Canyon NO2 ICE 1hr Model	NO2	1-HR	1ST	ALL	66.93	390407.0	3779876.0	5 YEARS	0.03702	0.0719	PPM	0.1089	PPM		PPM	0.18	PPM
				ENGINE1	58.09	390407.0	3779876.0	5 YEARS	0.03213			0.1040	PPM				
				ENGINE2	2.31	390407.0	3779876.0	5 YEARS	0.00128			0.0732	PPM				
				ENGINE3	2.37	390407.0	3779876.0	5 YEARS	0.00131			0.0732	PPM				
				ENGINE4	2.43	390407.0	3779876.0	5 YEARS	0.00135			0.0732	PPM				
				REGEN	0.30	390419.6	3779834.2	5 YEARS	0.00017			0.0721	PPM				
				FLARE12	1.85	390432.2	3779792.4	5 YEARS	0.00102			0.0729	PPM				
NO_2 NAAQS - ARM2																	
Scholl Canyon NO2 ICE 1hr Model	NO2	8TH-HIGHEST MAX DAILY 1-HR	1ST	ALL	37.65	390407.0	3779876.0	5 YEARS	0.02083	0.0593	PPM	0.0801	PPM	0.10	PPM		PPM
				ENGINE1	32.77	390407.0	3779876.0	5 YEARS	0.01813			0.0774	PPM				
				ENGINE2	1.30	390407.0	3779876.0	5 YEARS	0.00072			0.0600	PPM				
				ENGINE3	1.33	390407.0	3779876.0	5 YEARS	0.00074			0.0600	PPM				
				ENGINE4	1.38	390407.0	3779876.0	5 YEARS	0.00076			0.0601	PPM				
				REGEN	0.24	389646.5	3779975.3	5 YEARS	0.00013			0.0594	PPM				
				FLARE12	1.37	390212.1	3779354.5	5 YEARS	0.00076			0.0601	PPM				
PM10/PM2.5 State Standard																	
Scholl Canyon PM ICE 24hr Model	PM10/PM2.5	24-HR	1ST	ALL	1.373	390260.5	3779353.2	12/25/2014				1.373	UG/M3		UG/M3	Threshold PM10 - 2.5 PM2.5 - 2.5	UG/M3
				ENGINE1	0.276	390308.8	3779351.9	12/25/2014				0.276	UG/M4				
				ENGINE2	0.282	390438.3	3779909.3	3/26/2014				0.282	UG/M5				
				ENGINE3	0.290	390438.3	3779909.3	3/26/2014				0.290	UG/M6				
				ENGINE4	0.299	390438.3	3779909.3	3/26/2014				0.299	UG/M7				
				REGEN	0.066	390308.8	3779351.9	12/14/2015				0.066	UG/M8				
				FLARE12	0.269	390212.1	3779354.5	12/25/2014				0.269	UG/M9				
PM10 NAAQS Standard																	
Scholl Canyon PM ICE 24hr Model	PM10	24-HR	6TH	ALL	1.046	390350.0	3779350.0	1/11/2013		96	UG/M3	97.05	UG/M3	150	UG/M3		UG/M3
				ENGINE1	0.214	390357.1	3779350.6	1/11/2013				96.21	UG/M4				
				ENGINE2	0.215	390357.1	3779350.6	11/16/2015				96.22	UG/M5				
				ENGINE3	0.211	390357.1	3779350.6	11/16/2015				96.21	UG/M6				
				ENGINE4	0.206	390357.1	3779350.6	11/16/2015				96.21	UG/M7				
				REGEN	0.050	390260.5	3779353.2	1/28/2013				96.05	UG/M8				
				FLARE12	0.205	390250.0	3779350.0	1/11/2013				96.20	UG/M9				
PM2.5 NAAQS Standard																	
Scholl Canyon PM ICE 24hr Model	PM2.5	24-HR	8TH	ALL	0.956	390308.8	3779351.9	12/24/2016		30.5	UG/M3	31.46	UG/M3	35	UG/M3		UG/M3
				ENGINE1	0.192	390357.1	3779350.6	2/20/2013				30.69	UG/M4				
				ENGINE2	0.189	390357.1	3779350.6	2/20/2013				30.69	UG/M5				
				ENGINE3	0.189	390350.0	3779350.0	12/24/2016				30.69	UG/M6				
				ENGINE4	0.189	390350.0	3779350.0	12/24/2016				30.69	UG/M7				
				REGEN	0.048	390300.0	3779350.0	12/23/2015				30.55	UG/M8				
				FLARE12	0.191	390260.5	3779353.2	12/24/2016				30.69	UG/M9				

Description	Pollutant	Averaging Period	Highest	Source Group	Conc (ug/m3)	UTME	UTMN	Conc Date mm/dd/yy/hh	Conc (ppm)	Background	Unit	Total	Unit	NAAQS	Unit	SCAQMD	Unit
SO_2 State Standard																	
Scholl Canyon SO2 ICE 1hr Model	SO2	1-HR	1ST	ALL	8.10	390407.0	3779876.0	5 YEARS	0.00322	0.018	PPM	0.0212	PPM		PPM	0.25	PPM
				ENGINE1	1.73	390407.0	3779876.0	5 YEARS	0.00069			0.0187	PPM				
				ENGINE2	1.76	390407.0	3779876.0	5 YEARS	0.00070			0.0187	PPM				
				ENGINE3	1.81	390407.0	3779876.0	5 YEARS	0.00072			0.0187	PPM				
				ENGINE4	1.86	390407.0	3779876.0	5 YEARS	0.00074			0.0187	PPM				
				REGEN	0.37	390419.6	3779834.2	5 YEARS	0.00015			0.0181	PPM				
				FLARE12	0.80	390432.2	3779792.4	5 YEARS	0.00032			0.0183	PPM				
Scholl Canyon SO2 ICE 3hr Model	SO2	3-HR	1ST	ALL	6.87	390438.3	3779909.3	03/26/14/21	0.00273	0.002	PPM	0.0047	PPM		PPM	0.04	PPM
				ENGINE1	1.46	390438.3	3779909.3	03/26/14/21	0.00058			0.0026	PPM				
				ENGINE2	1.53	390438.3	3779909.3	03/26/14/21	0.00061			0.0026	PPM				
				ENGINE3	1.59	390438.3	3779909.3	03/26/14/21	0.00063			0.0026	PPM				
				ENGINE4	1.65	390438.3	3779909.3	03/26/14/21	0.00066			0.0027	PPM				
				REGEN	0.33	389664.0	3779939.0	08/30/16/21	0.00013			0.0021	PPM				
				FLARE12	0.65	390018.9	3779359.6	04/18/13/03	0.00026			0.0023	PPM				
Scholl Canyon SO2 ICE 24hr Model	SO2	24-HR	1ST	ALL	1.77	390300.0	3779350.0	12/25/2014	0.00071	0.002	PPM	0.0027	PPM	0.5	PPM	0.04	PPM
				ENGINE1	0.38	390308.8	3779351.9	12/25/2014	0.00015			0.0022	PPM				
				ENGINE2	0.39	390438.3	3779909.3	3/26/2014	0.00015			0.0022	PPM				
				ENGINE3	0.40	390438.3	3779909.3	3/26/2014	0.00016			0.0022	PPM				
				ENGINE4	0.41	390438.3	3779909.3	3/26/2014	0.00016			0.0022	PPM				
				REGEN	0.11	390308.8	3779351.9	12/14/2015	0.00004			0.0020	PPM				
				FLARE12	0.22	390212.1	3779354.5	12/25/2014	0.00009			0.0021	PPM				
SO_2 NAAQS																	
Scholl Canyon SO2 ICE 1hr Model	SO2	4TH-HIGHEST MAX DAILY 1-HR	4TH	ALL	5.77	390407.0	3779876.0	5 YEARS	0.00229	0.0094	PPM	0.0117	PPM	0.075	PPM		PPM
				ENGINE1	1.25	390407.0	3779876.0	5 YEARS	0.00050			0.0099	PPM				
				ENGINE2	1.27	390407.0	3779876.0	5 YEARS	0.00051			0.0099	PPM				
				ENGINE3	1.28	390407.0	3779876.0	5 YEARS	0.00051			0.0099	PPM				
				ENGINE4	1.31	390407.0	3779876.0	5 YEARS	0.00052			0.0099	PPM				
				REGEN	0.32	389664.0	3779939.0	5 YEARS	0.00013			0.0095	PPM				
				FLARE12	0.65	390163.8	3779355.7	5 YEARS	0.00026			0.0097	PPM				

CO 1 Hour NAAQS = Not to be exceeded more than once per year. Design values based on highest 1 hour model result over 5 years and highest 1 hour monitored background 2017 - 2019.

CO 1 Hour SCAQMD = Not to be exceeded. Design values based on highest 1 hour model result over 5 years and highest 1 hour monitored background 2017 - 2019.

CO 8 Hour NAAQS = Not to be exceeded more than once per year. Design values based on highest 8 hour model result over 5 years and highest 8 hour monitored background 2017 - 2019.

CO 8 Hour SCAQMD = Not to be exceeded. Design values based on highest 8 hour model result over 5 years and highest 8 hour monitored background 2017 - 2019.

NO2 1 Hour NAAQS = 98th percentile of 1-hour daily maximum concentrations, averaged over 3 years (approx 8th highest). Design value based on 98th percentile of 1-hour daily maximum concentrations, averaged over 5 years and the highest 98th percentile monitored concentration for years 2017-2019.

NO2 1 Hour SCAQMD = Not to be exceeded. Design values based on highest 1 hour model result over 5 years and highest 1 hour monitored background 2017 - 2019.

PM10/PM2.5 24 Hour SCAQMD = Not to exceeded significant threshold. Design value based on 1st highest max 5 year model result.

PM10 24 Hour NAAQS = Not to be exceeded more than once per year on average over 3 years (2nd Highest). Design value based on 6th highest max 5 year model result and highest monitored background 2017-2019.

PM2.5 24 Hour NAAQS = 98th percentile, averaged over 3 years (8th highest not including secondary). Design value based on 98th percentile, averaged over 5 years, and the highest 98th percentile 24 hour monitored background 2017 - 2019. No secondary emissions included.

SO2 1 Hour NAAQS = 99th percentile of 1-hour daily maximum concentrations, averaged over 3 years (approx 4th highest). Design value based on 99th percentile of 1-hour daily maximum concentrations, averaged over 5 years and the highest 99th percentile 1 hour monitored background 2017 - 2019.

SO2 1 Hour SCAQMD = Not to be exceeded. Design values based on highest 1 hour model result over 5 years and highest 1 hour monitored background 2017 - 2019.

SO2 24 Hour SCAQMD = Not to be exceeded. Design values based on highest 24 hour model result over 5 years and highest 24 hour monitored background 2017 - 2019.

Description	Pollutant	Averaging Period	Highest	Source Group	Conc (ug/m3)	UTME	UTMN	Conc Date	Conc (ppm)	Background	Unit	Total	Unit	NAAQS	Unit	SCAQMD	Unit
NO_2 State Standard/NAAQS Normal Operations - ARM																	
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	ALL	0.411	389950.0	3780650.0	2012	0.00023	0.0154	PPM	0.0156	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	ALL	0.418	389950.0	3780650.0	2013	0.00023			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	ALL	0.444	389950.0	3780650.0	2014	0.00025			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	ALL	0.413	389950.0	3780650.0	2015	0.00023			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	ALL	0.440	389950.0	3780650.0	2016	0.00024			0.0156	PPM				
								5 Year Max	**0.00025**			**0.0156**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	ENGINE1	0.090	389950.0	3780650.0	2012	0.000050	0.0154	PPM	0.0154	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	ENGINE1	0.091	389950.0	3780650.0	2013	0.000051			0.0155	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	ENGINE1	0.097	389950.0	3780650.0	2014	0.000054			0.0155	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	ENGINE1	0.091	389950.0	3780650.0	2015	0.000050			0.0155	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	ENGINE1	0.097	389950.0	3780650.0	2016	0.000053			0.0155	PPM				
								5 Year Max	**0.000054**			**0.0155**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	ENGINE2	0.089	389950.0	3780650.0	2012	0.000049	0.0154	PPM	0.0154	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	ENGINE2	0.090	389950.0	3780650.0	2013	0.000050			0.0155	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	ENGINE2	0.096	389950.0	3780650.0	2014	0.000053			0.0155	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	ENGINE2	0.089	389950.0	3780650.0	2015	0.000049			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	ENGINE2	0.095	389950.0	3780650.0	2016	0.000053			0.0155	PPM				
								5 Year Max	**0.000053**			**0.0155**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	ENGINE3	0.088	389950.0	3780650.0	2012	0.000049	0.0154	PPM	0.0154	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	ENGINE3	0.089	389950.0	3780650.0	2013	0.000049			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	ENGINE3	0.095	389950.0	3780650.0	2014	0.000053			0.0155	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	ENGINE3	0.088	389950.0	3780650.0	2015	0.000049			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	ENGINE3	0.094	389950.0	3780650.0	2016	0.000052			0.0155	PPM				
								5 Year Max	**0.000053**			**0.0155**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	ENGINE4	0.087	389950.0	3780650.0	2012	0.000048	0.0154	PPM	0.0154	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	ENGINE4	0.088	389950.0	3780650.0	2013	0.000049			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	ENGINE4	0.094	389950.0	3780650.0	2014	0.000052			0.0155	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	ENGINE4	0.087	389950.0	3780650.0	2015	0.000048			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	ENGINE4	0.093	389950.0	3780650.0	2016	0.000051			0.0155	PPM				
								5 Year Max	**0.000052**			**0.0155**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	REGEN	0.012	389918.0	3780577.0	2012	0.0000066	0.0154	PPM	0.0154	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	REGEN	0.012	389918.0	3780577.0	2013	0.0000067			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	REGEN	0.013	389918.0	3780577.0	2014	0.0000071			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	REGEN	0.012	389918.0	3780577.0	2015	0.0000067			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	REGEN	0.013	389918.0	3780577.0	2016	0.0000071			0.0154	PPM				
								5 Year Max	**0.000007**			**0.0154**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	FLARE12	0.049	389940.0	3780593.5	2012	0.000027	0.0154	PPM	0.0154	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	FLARE12	0.050	389940.0	3780593.5	2013	0.000028			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	FLARE12	0.053	389940.0	3780593.5	2014	0.000029			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	FLARE12	0.049	389940.0	3780593.5	2015	0.000027			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	FLARE12	0.054	389940.0	3780593.5	2016	0.000030			0.0154	PPM				
								5 Year Max	**0.000030**			**0.0154**	**PPM**				

Description	Pollutant	Averaging Period	Highest	Source Group	Conc (ug/m3)	UTME	UTMN	Conc Date	Conc (ppm)	Background	Unit	Total	Unit	NAAQS	Unit	SCAQMD	Unit
PM10/PM2.5 State Standard Normal																	
Scholl Canyon ICE AnnualElevation_2008_PM	PM10, PM2.5	ANNUAL	1ST	ALL	0.179	389950.0	3780650.0	2012				0.179	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE AnnualElevation_2009_PM	PM10, PM2.5	ANNUAL	1ST	ALL	0.182	389950.0	3780650.0	2013				0.182	UG/M3				
Scholl Canyon ICE AnnualElevation_2010_PM	PM10, PM2.5	ANNUAL	1ST	ALL	0.193	389950.0	3780650.0	2014				0.193	UG/M3				
Scholl Canyon ICE AnnualElevation_2011_PM	PM10, PM2.5	ANNUAL	1ST	ALL	0.180	389950.0	3780650.0	2015				0.180	UG/M3				
Scholl Canyon ICE AnnualElevation_2012_PM	PM10, PM2.5	ANNUAL	1ST	ALL	0.192	389962.0	3780610.0	2016				0.192	UG/M3				
				5 Year Average	**0.185**							**0.185**	**UG/M3**				
Scholl Canyon ICE Annual_2008_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE1	0.037	389950.0	3780650.0	2012				0.0372	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE Annual_2009_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE1	0.038	389950.0	3780650.0	2013				0.0377	UG/M3				
Scholl Canyon ICE Annual_2010_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE1	0.040	389950.0	3780650.0	2014				0.0402	UG/M3				
Scholl Canyon ICE Annual_2011_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE1	0.037	389950.0	3780650.0	2015				0.0374	UG/M3				
Scholl Canyon ICE Annual_2012_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE1	0.040	389950.0	3780650.0	2016				0.0398	UG/M3				
				5 Year Average	**0.038**							**0.0385**	**UG/M3**				
Scholl Canyon ICE Annual_2008_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE2	0.037	389950.0	3780650.0	2012				0.0368	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE Annual_2009_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE2	0.037	389950.0	3780650.0	2013				0.0373	UG/M3				
Scholl Canyon ICE Annual_2010_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE2	0.040	389950.0	3780650.0	2014				0.0397	UG/M3				
Scholl Canyon ICE Annual_2011_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE2	0.037	389950.0	3780650.0	2015				0.0369	UG/M3				
Scholl Canyon ICE Annual_2012_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE2	0.039	389950.0	3780650.0	2016				0.0393	UG/M3				
				5 Year Average	**0.038**							**0.0380**	**UG/M3**				
Scholl Canyon ICE AnnualElevation_2008_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE3	0.036	389950.0	3780650.0	2012				0.036	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE AnnualElevation_2009_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE3	0.037	389950.0	3780650.0	2013				0.037	UG/M3				
Scholl Canyon ICE AnnualElevation_2010_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE3	0.039	389950.0	3780650.0	2014				0.039	UG/M3				
Scholl Canyon ICE AnnualElevation_2011_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE3	0.036	389950.0	3780650.0	2015				0.036	UG/M3				
Scholl Canyon ICE AnnualElevation_2012_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE3	0.039	389950.0	3780650.0	2016				0.039	UG/M3				
				5 Year Average	**0.038**							**0.038**	**UG/M3**				
Scholl Canyon ICE AnnualElevation_2008_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE4	0.036	389950.0	3780650.0	2012				0.036	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE AnnualElevation_2009_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE4	0.036	389950.0	3780650.0	2013				0.036	UG/M3				
Scholl Canyon ICE AnnualElevation_2010_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE4	0.039	389950.0	3780650.0	2014				0.039	UG/M3				
Scholl Canyon ICE AnnualElevation_2011_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE4	0.036	389950.0	3780650.0	2015				0.036	UG/M3				
Scholl Canyon ICE AnnualElevation_2012_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE4	0.038	389950.0	3780650.0	2016				0.038	UG/M3				
				5 Year Average	**0.037**							**0.037**	**UG/M3**				
Scholl Canyon ICE AnnualElevation_2008_PM	PM10, PM2.5	ANNUAL	1ST	REGEN	0.009	389918.0	3780577.0	2012				0.009	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE AnnualElevation_2009_PM	PM10, PM2.5	ANNUAL	1ST	REGEN	0.009	389918.0	3780577.0	2013				0.009	UG/M3				
Scholl Canyon ICE AnnualElevation_2010_PM	PM10, PM2.5	ANNUAL	1ST	REGEN	0.010	389918.0	3780577.0	2014				0.010	UG/M3				
Scholl Canyon ICE AnnualElevation_2011_PM	PM10, PM2.5	ANNUAL	1ST	REGEN	0.009	389918.0	3780577.0	2015				0.009	UG/M3				
Scholl Canyon ICE AnnualElevation_2012_PM	PM10, PM2.5	ANNUAL	1ST	REGEN	0.010	389918.0	3780577.0	2016				0.010	UG/M3				
				5 Year Average	**0.009**							**0.009**	**UG/M3**				
Scholl Canyon ICE AnnualElevation_2008_PM	PM10, PM2.5	ANNUAL	1ST	FLARE12	0.026	389940.0	3780593.5	2012				0.026	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE AnnualElevation_2009_PM	PM10, PM2.5	ANNUAL	1ST	FLARE12	0.027	389940.0	3780593.5	2013				0.027	UG/M3				
Scholl Canyon ICE AnnualElevation_2010_PM	PM10, PM2.5	ANNUAL	1ST	FLARE12	0.028	389940.0	3780593.5	2014				0.028	UG/M3				
Scholl Canyon ICE AnnualElevation_2011_PM	PM10, PM2.5	ANNUAL	1ST	FLARE12	0.026	389940.0	3780593.5	2015				0.026	UG/M3				
Scholl Canyon ICE AnnualElevation_2012_PM	PM10, PM2.5	ANNUAL	1ST	FLARE12	0.029	389940.0	3780593.5	2016				0.029	UG/M3				
				5 Year Average	**0.027**							**0.027**	**UG/M3**				

NO2 Annual NAAQS = Annual mean. Design value based on highest annual mean over 5 years of model result and highest annual monitored background 2017 - 2019. ARM Method = 80% of model results.

PM10/PM2.5 Annual SCAQMD = Not to exceeded significant threshold. Design value based on the 5 year average of annual mean model result.

PM Annual NAAQS = Equal to the annual mean averaged over 3 years. Design value based on the 5 year average of annual mean model result and highest annual monitored background 2017 - 2019.

SITE MAPS SHOWING THE LOCATIONS OF MODELING RESULTS

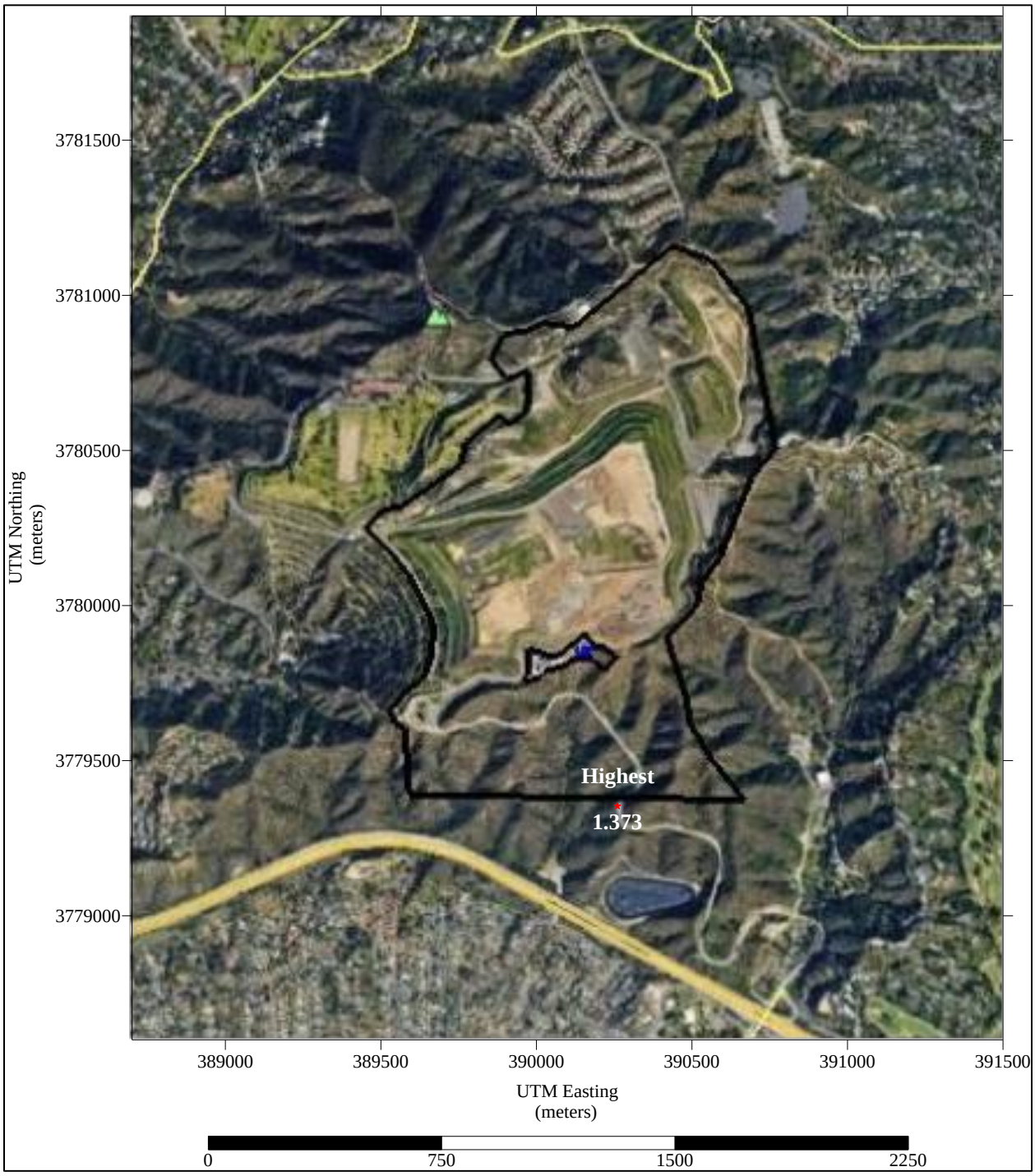
AERMOD Output for 1st highest 1-Hourly NO_2 Concentrations (in ppm)

AERMOD Output for 8th highest 1-hourly NO2 Concentrations (ppm)

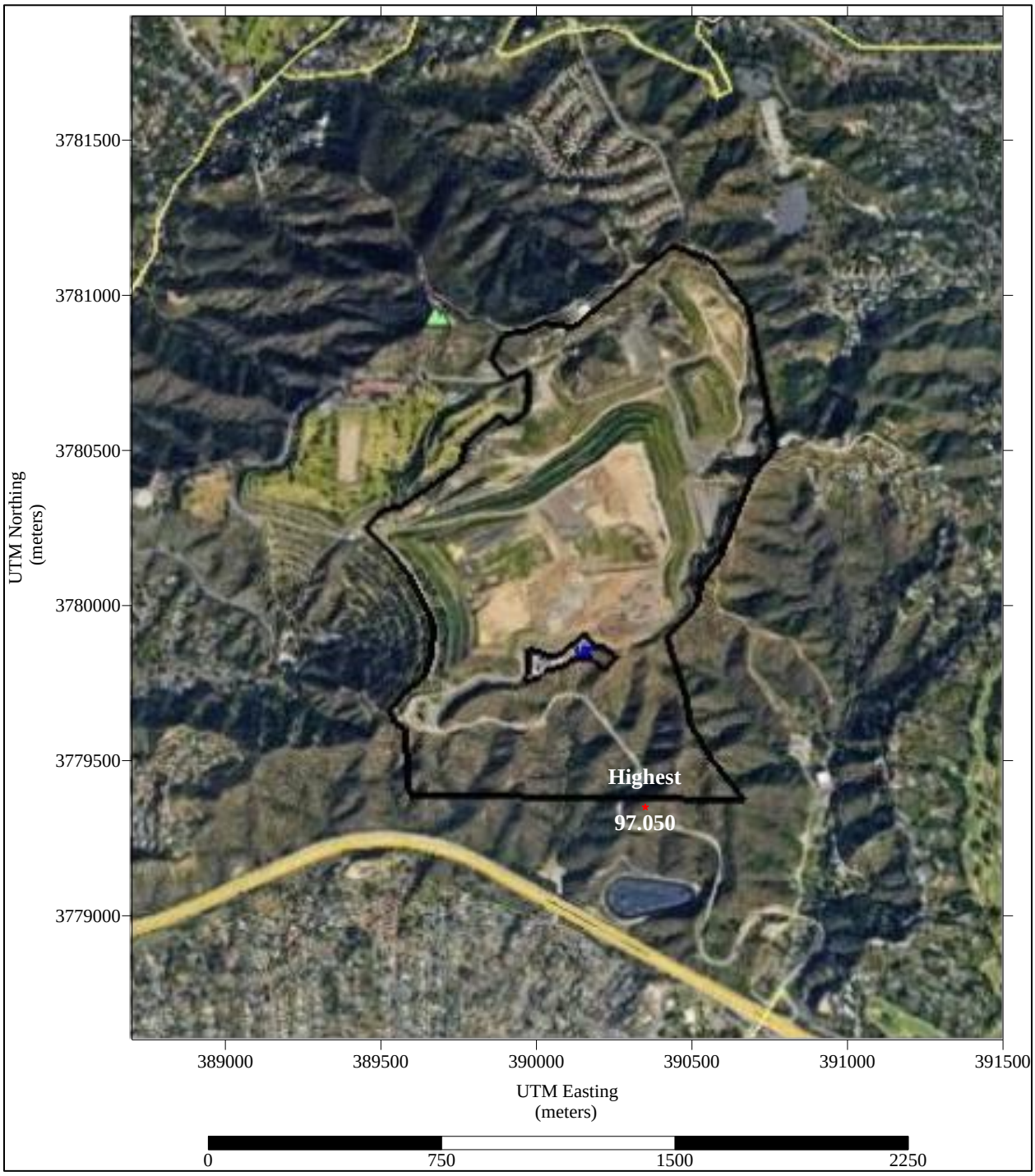
AERMOD Output for Annual NO_2 Concentrations (in ppm)

AERMOD Output for 1st Highest 1-Hourly and 8-Hourly CO Concentrations (in ppm)

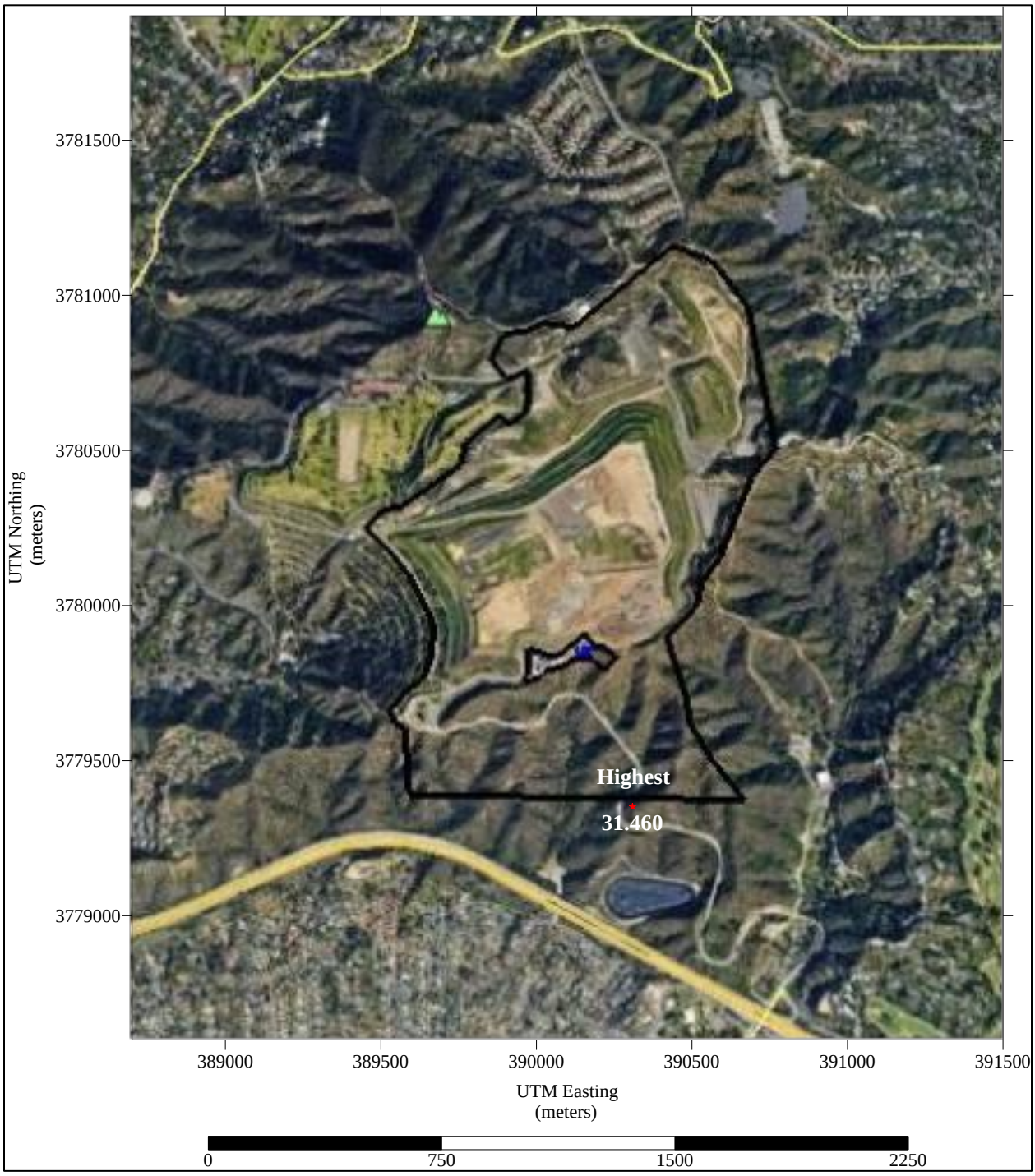
AERMOD Output for 1st Highest 24-hour PM10 Concentrations (µg/m³)



AERMOD Output for 6th Highest 24-hour PM10 Concentrations (µg/m³)

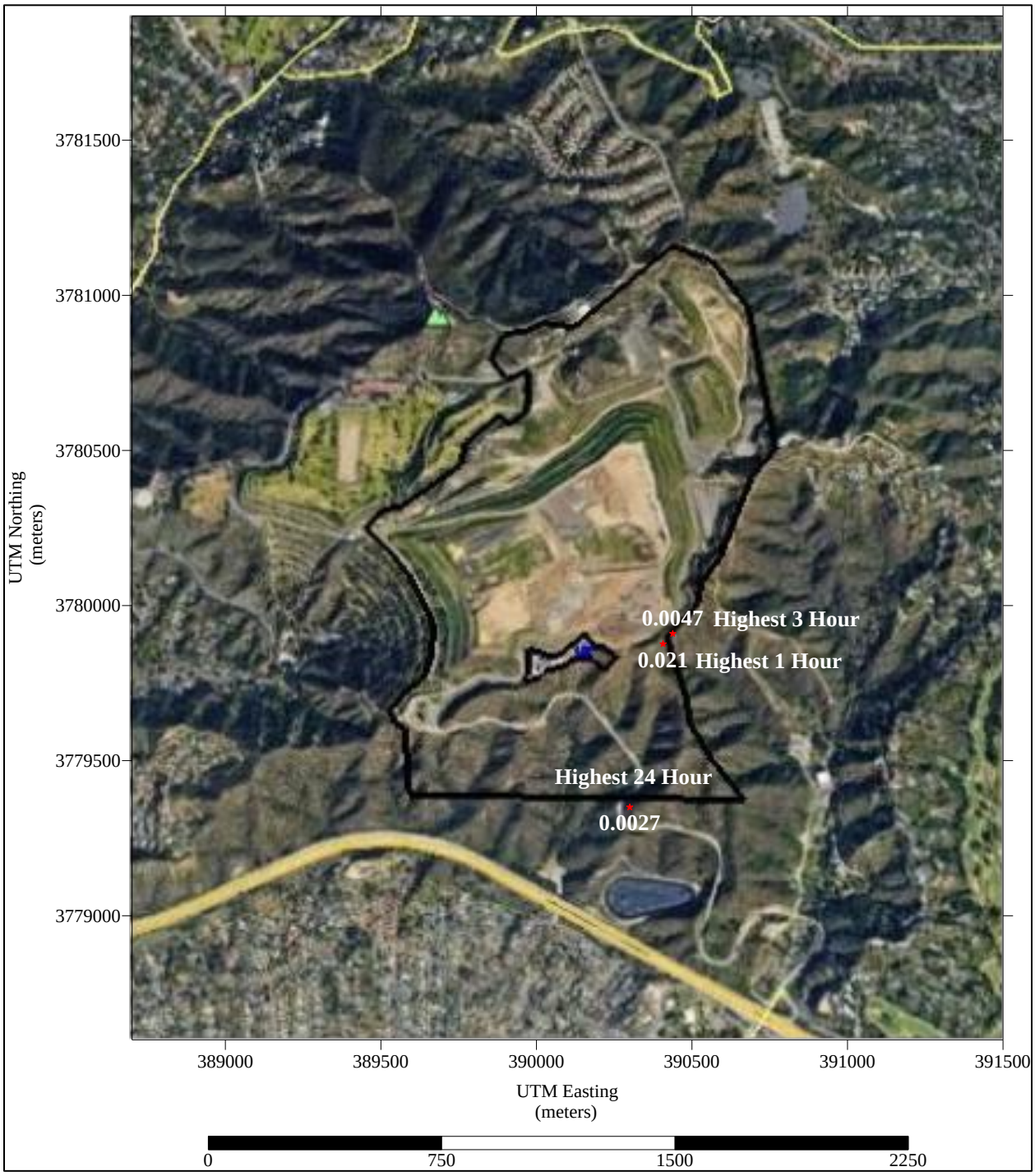


AERMOD Output for 8th Highest 24-hour PM2.5 Concentrations (µg/m³)

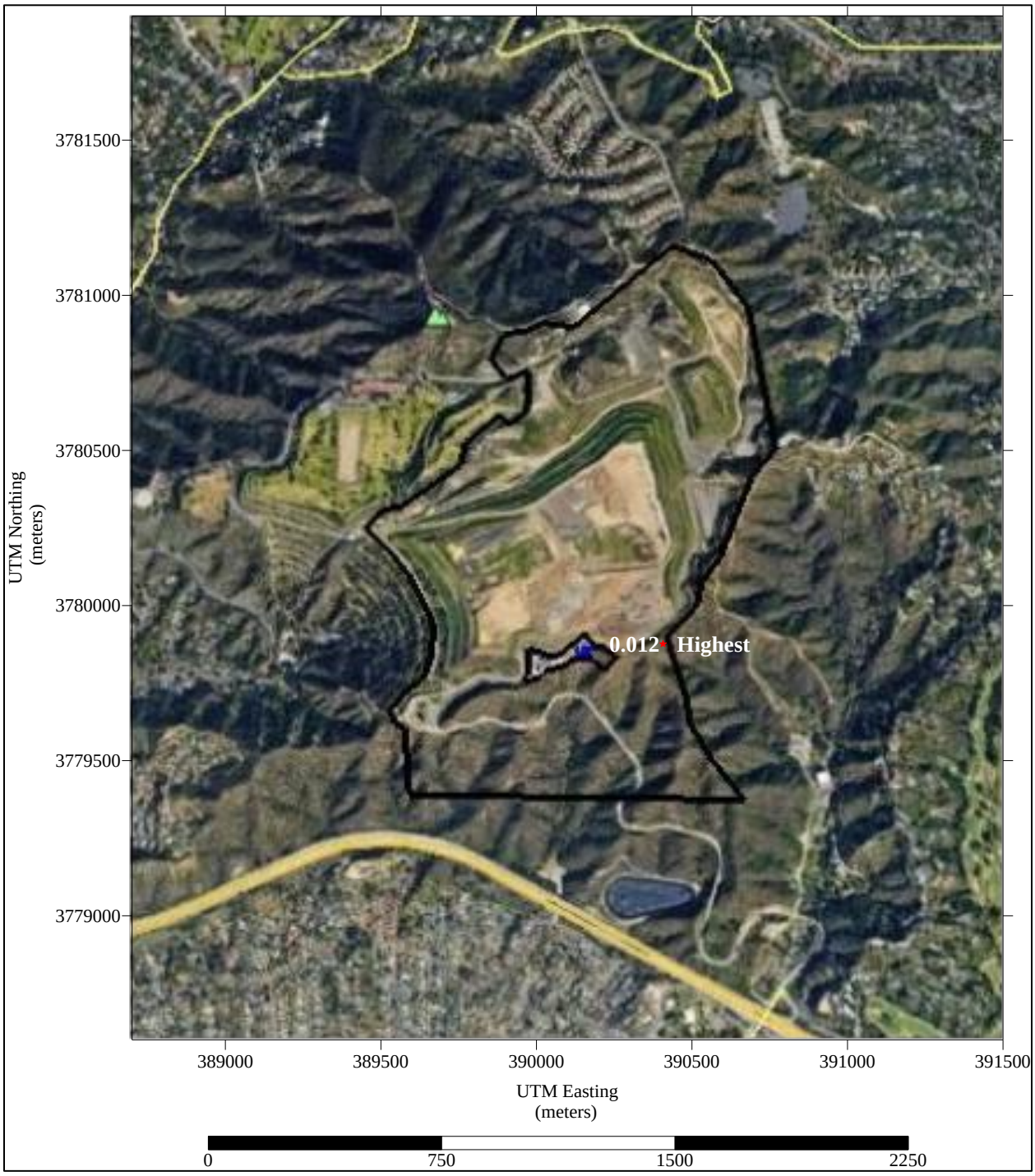


AERMOD Output for Annual Average PM10/PM2.5 Concentrations (µg/m³)

AERMOD Output for 1st highest 1-hour and 24-hour SO_2 Concentrations (ppm)



AERMOD Output for 4th highest 1-hour SO_2 Concentrations (ppm)



POST LANDFILL CLOSURE

MODELING INPUT INFORMATION

Point Sources - 1 Hour Model

Model ID	Source Description	UTME (m)	UTMN (m)	Elevation (m)	Stack Height (m)	Temperature (K)	Exit Velocity (m/s)	Stack Dia. (m)	NOx Emission (g/s)	CO Emission (g/s)	SO2 Emission (g/s)	PM Emission (g/s)
ENGINE1	Generator 1	390140.0	3779830.2	436.27	12.192	698.150	32.504	0.6096	3.94968	7.10960	0.10584	
ENGINE2	Generator 2	390147.2	3779828.8	437.82	12.192	698.150	32.504	0.6096	0.15372	1.10878	0.10584	
ENGINE3	Generator 3	390154.5	3779827.5	440.51	12.192	698.150	32.504	0.6096	0.15372	1.10878	0.10584	
ENGINE4	Generator 4	390161.7	3779827.4	443.05	12.192	698.150	32.504	0.6096	0.15372	1.10878	0.10584	
REGEN	Regen Flare	390047.3	3779809.2	429.86	8.534	1033.150	3.359	1.2192	0.01575	0.03780	0.01755	
FLARE12	Existing Flare 12	390039.6	3779808.2	429.97	4.877	1051.210	2.243	2.4384	0.11450	0.01027	0.04495	

Point Sources - 3 Hour Model

Model ID	Source Description	UTME (m)	UTMN (m)	Elevation (m)	Stack Height (m)	Temperature (K)	Exit Velocity (m/s)	Stack Dia. (m)	NOx Emission (g/s)	CO Emission (g/s)	SO2 Emission (g/s)	PM Emission (g/s)
ENGINE1	Generator 1	390140.0	3779830.2	439.40	12.192	698.150	32.504	0.6096			0.10584	
ENGINE2	Generator 2	390147.2	3779828.8	439.40	12.192	698.150	32.504	0.6096			0.10584	
ENGINE3	Generator 3	390154.5	3779827.5	439.40	12.192	698.150	32.504	0.6096			0.10584	
ENGINE4	Generator 4	390161.7	3779827.4	439.40	12.192	698.150	32.504	0.6096			0.10584	
REGEN	Regen Flare	390047.3	3779809.2	429.86	8.534	1033.150	3.359	1.2192			0.01755	
FLARE12	Existing Flare 12	390039.6	3779808.2	429.97	4.877	1051.210	2.243	2.4384			0.04495	

Point Sources - 8 Hour Model

Model ID	Source Description	UTME (m)	UTMN (m)	Elevation (m)	Stack Height (m)	Temperature (K)	Exit Velocity (m/s)	Stack Dia. (m)	NOx Emission (g/s)	CO Emission (g/s)	SO2 Emission (g/s)	PM Emission (g/s)
ENGINE1	Generator 1	390140.0	3779830.2	439.40	12.192	698.150	32.504	0.6096		3.37631		
ENGINE2	Generator 2	390147.2	3779828.8	439.40	12.192	698.150	32.504	0.6096		1.10878		
ENGINE3	Generator 3	390154.5	3779827.5	439.40	12.192	698.150	32.504	0.6096		1.10878		
ENGINE4	Generator 4	390161.7	3779827.4	439.40	12.192	698.150	32.504	0.6096		1.10878		
REGEN	Regen Flare	390047.3	3779809.2	429.86	8.534	1033.150	3.359	1.2192		0.03780		
FLARE12	Existing Flare 12	390039.6	3779808.2	429.97	4.877	1051.210	2.243	2.4384		0.01027		

Point Sources - 24 Hour Model

Model ID	Source Description	UTME (m)	UTMN (m)	Elevation (m)	Stack Height (m)	Temperature (K)	Exit Velocity (m/s)	Stack Dia. (m)	NOx Emission (g/s)	CO Emission (g/s)	SO2 Emission (g/s)	PM Emission (g/s)
ENGINE1	Generator 1	390140.0	3779830.2	439.40	12.192	698.150	32.504	0.6096			0.10584	0.07669
ENGINE2	Generator 2	390147.2	3779828.8	439.40	12.192	698.150	32.504	0.6096			0.10584	0.07669
ENGINE3	Generator 3	390154.5	3779827.5	439.40	12.192	698.150	32.504	0.6096			0.10584	0.07669
ENGINE4	Generator 4	390161.7	3779827.4	439.40	12.192	698.150	32.504	0.6096			0.10584	0.07669
REGEN	Regen Flare	390047.3	3779809.2	429.86	8.534	1033.150	3.359	1.2192			0.01755	0.01057
FLARE12	Existing Flare 12	390039.6	3779808.2	429.97	4.877	1051.210	2.243	2.4384			0.04495	0.05522

Point Sources - Annual Model

Model ID	Source Description	UTME (m)	UTMN (m)	Elevation (m)	Stack Height (m)	Temperature (K)	Exit Velocity (m/s)	Stack Dia. (m)	NOx Emission (g/s)	CO Emission (g/s)	SO2 Emission (g/s)	PM Emission (g/s)
ENGINE1	Generator 1	390140.0	3779830.2	439.40	12.192	698.150	32.504	0.6096	0.20660		0.10584	0.07669
ENGINE2	Generator 2	390147.2	3779828.8	439.40	12.192	698.150	32.504	0.6096	0.20660		0.10584	0.07669
ENGINE3	Generator 3	390154.5	3779827.5	439.40	12.192	698.150	32.504	0.6096	0.20660		0.10584	0.07669
ENGINE4	Generator 4	390161.7	3779827.4	439.40	12.192	698.150	32.504	0.6096	0.20660		0.10584	0.07669
REGEN	Regen Flare	390047.3	3779809.2	429.86	8.534	1033.150	3.359	1.2192	0.01575		0.01755	0.01057
FLARE12	Existing Flare 12	390039.6	3779808.2	429.97	4.877	1051.210	2.243	2.4384	0.11450		0.04495	0.05522

POST LANDFILL CLOSURE

AQIA RESULTS
(SHORT-TERM & ANNUAL)

Description	Pollutant	Averaging Period	Highest	Source Group	Conc (ug/m3)	UTME	UTMN	Conc Date mm/dd/yy/hh	Conc (ppm)	Background	Unit	Total	Unit	NAAQS	Unit	SCAQMD	Unit
CO State Standard/NAAQS																	
Scholl Canyon CO ICE 1hr Model	CO	1-HR	1ST	ALL	852.62	390227.3	3779790.7	11/23/16/17	0.77485	2.6	PPM	3.3748	PPM	35	PPM	20	PPM
				ENGINE1	534.49	390227.3	3779790.7	11/23/16/17	0.48573			3.0857	PPM				
				ENGINE2	80.89	390227.3	3779790.7	10/25/12/04	0.07351			2.6735	PPM				
				ENGINE3	113.58	390227.3	3779790.7	11/23/16/17	0.10322			2.7032	PPM				
				ENGINE4	138.68	390227.3	3779790.7	04/08/13/19	0.12603			2.7260	PPM				
				REGEN	5.74	390045.0	3779776.0	01/24/15/08	0.00521			2.6052	PPM				
				FLARE12	12.54	390041.0	3779818.0	01/31/16/14	0.01139			2.6114	PPM				
Scholl Canyon CO ICE 8hr Model	CO	8-HR	1ST	ALL	223.78	390227.3	3779790.7	10/25/12/16	0.20337	1.6	PPM	1.8034	PPM	9	PPM	9	PPM
				ENGINE1	97.03	390227.3	3779790.7	10/25/12/16	0.08818			1.6882	PPM				
				ENGINE2	34.52	390227.3	3779790.7	10/25/12/16	0.03137			1.6314	PPM				
				ENGINE3	39.92	390239.0	3779803.0	10/25/12/16	0.03628			1.6363	PPM				
				ENGINE4	53.99	390227.3	3779790.7	10/25/12/16	0.04907			1.6491	PPM				
				REGEN	3.11	390005.0	3779753.0	01/27/12/24	0.00282			1.6028	PPM				
				FLARE12	6.22	390041.0	3779818.0	05/25/12/16	0.00566			1.6057	PPM				
NO_2 State Standard - ARM2																	
Scholl Canyon NO2 ICE 1hr Model	NO2	1-HR	1ST	ALL	151.15	390227.3	3779790.7	5 YEARS	0.08361	0.0719	PPM	0.1555	PPM		PPM	0.18	PPM
				ENGINE1	133.19	390227.3	3779790.7	5 YEARS	0.07368			0.1456	PPM				
				ENGINE2	5.28	390227.3	3779790.7	5 YEARS	0.00292			0.0748	PPM				
				ENGINE3	6.38	390227.3	3779790.7	5 YEARS	0.00353			0.0754	PPM				
				ENGINE4	10.05	390227.3	3779790.7	5 YEARS	0.00556			0.0775	PPM				
				REGEN	1.67	390050.0	3779750.0	5 YEARS	0.00092			0.0728	PPM				
				FLARE12	99.80	390041.0	3779818.0	5 YEARS	0.05520			0.1271	PPM				
NO_2 NAAQS - ARM2																	
Scholl Canyon NO2 ICE 1hr Model	NO2	8TH-HIGHEST MAX DAILY 1-HR	1ST	ALL	116.56	390239.0	3779803.0	5 YEARS	0.06448	0.0593	PPM	0.1238	PPM	0.10	PPM		PPM
				ENGINE1	99.99	390239.0	3779803.0	5 YEARS	0.05531			0.1146	PPM				
				ENGINE2	4.35	390239.0	3779803.0	5 YEARS	0.00241			0.0617	PPM				
				ENGINE3	4.99	390239.0	3779803.0	5 YEARS	0.00276			0.0621	PPM				
				ENGINE4	6.76	390227.3	3779790.7	5 YEARS	0.00374			0.0630	PPM				
				REGEN	0.95	390050.0	3779750.0	5 YEARS	0.00052			0.0598	PPM				
				FLARE12	62.65	390041.0	3779818.0	5 YEARS	0.03465			0.0940	PPM				
PM10/PM2.5 State Standard																	
Scholl Canyon PM ICE 24hr Model	PM10/PM2.5	24-HR	1ST	ALL	11.73	390041.0	3779818.0	5/25/2012				11.731	UG/M3		UG/M3	Threshold PM10 - 2.5 PM2.5 - 2.5	UG/M3
				ENGINE1	1.53	390227.3	3779790.7	10/25/2012				1.528	UG/M3				
				ENGINE2	1.72	390227.3	3779790.7	10/25/2012				1.720	UG/M3				
				ENGINE3	1.90	390227.3	3779790.7	10/25/2012				1.901	UG/M3				
				ENGINE4	2.65	390227.3	3779790.7	10/25/2012				2.653	UG/M3				
				REGEN	0.49	390009.0	3779758.0	12/31/2014				0.485	UG/M3				
				FLARE12	11.70	390041.0	3779818.0	5/25/2012				11.703	UG/M3				
PM10 NAAQS Standard																	
Scholl Canyon PM ICE 24hr Model	PM10	24-HR	6TH	ALL	8.255	390041.0	3779818.0	7/1/2016		96	UG/M3	104.26	UG/M3	150	UG/M3		UG/M3
				ENGINE1	0.736	390227.3	3779790.7	3/8/2016				96.74	UG/M3				
				ENGINE2	0.867	390227.3	3779790.7	11/10/2012				96.87	UG/M3				
				ENGINE3	0.978	390227.3	3779790.7	11/23/2016				96.98	UG/M3				
				ENGINE4	1.319	390227.3	3779790.7	12/27/2012				97.32	UG/M3				
				REGEN	0.279	390100.0	3779750.0	12/14/2015				96.28	UG/M3				
				FLARE12	8.178	390041.0	3779818.0	7/1/2016				104.18	UG/M3				
PM2.5 NAAQS Standard																	
Scholl Canyon PM ICE 24hr Model	PM2.5	24-HR	8TH	ALL	8.027	390041.0	3779818.0	5/20/2016		30.5	UG/M3	38.53	UG/M3	35	UG/M3		UG/M3
				ENGINE1	0.715	390227.3	3779790.7	11/10/2012				31.21	UG/M3				
				ENGINE2	0.805	390227.3	3779790.7	6/9/2015				31.31	UG/M3				
				ENGINE3	0.890	390227.3	3779790.7	4/26/2014				31.39	UG/M3				
				ENGINE4	1.262	390227.3	3779790.7	3/8/2016				31.76	UG/M3				
				REGEN	0.238	390100.0	3779700.0	12/25/2015				30.74	UG/M3				
				FLARE12	7.944	390041.0	3779818.0	5/4/2013				38.44	UG/M3				

Description	Pollutant	Averaging Period	Highest	Source Group	Conc (ug/m3)	UTME	UTMN	Conc Date mm/dd/yy/hh	Conc (ppm)	Background	Unit	Total	Unit	NAAQS	Unit	SCAQMD	Unit
SO_2 State Standard																	
Scholl Canyon SO2 ICE 1hr Model	SO2	1-HR	1ST	ALL	45.11	390041.0	3779818.0	5 YEARS	0.01794	0.018	PPM	0.0359	PPM		PPM	0.25	PPM
				ENGINE1	7.04	390227.3	3779790.7	5 YEARS	0.00280			0.0208	PPM				
				ENGINE2	6.17	390239.0	3779803.0	5 YEARS	0.00245			0.0205	PPM				
				ENGINE3	7.64	390227.3	3779790.7	5 YEARS	0.00304			0.0210	PPM				
				ENGINE4	12.80	390227.3	3779790.7	5 YEARS	0.00509			0.0231	PPM				
				REGEN	2.06	390050.0	3779750.0	5 YEARS	0.00082			0.0188	PPM				
				FLARE12	45.08	390041.0	3779818.0	5 YEARS	0.01792								
Scholl Canyon SO2 ICE 3hr Model	SO2	3-HR	1ST	ALL	35.97	390041.0	3779818.0	05/25/12/12	0.01430	0.002	PPM	0.0163	PPM		PPM	0.04	PPM
				ENGINE1	4.63	390227.3	3779790.7	10/25/12/06	0.00184			0.0038	PPM				
				ENGINE2	5.06	390227.3	3779790.7	10/25/12/06	0.00201			0.0040	PPM				
				ENGINE3	6.08	390227.3	3779790.7	11/23/16/18	0.00242			0.0044	PPM				
				ENGINE4	7.61	390227.3	3779790.7	04/01/12/12	0.00302			0.0050	PPM				
				REGEN	2.00	390009.0	3779758.0	12/31/14/03	0.00079			0.0028	PPM				
				FLARE12	35.94	390041.0	3779818.0	05/25/12/12	0.01429			0.0163	PPM				
Scholl Canyon SO2 ICE 24hr Model	SO2	24-HR	1ST	ALL	11.09	390227.3	3779790.7	10/25/2012	0.00441	0.002	PPM	0.0064	PPM	0.5	PPM	0.04	PPM
				ENGINE1	2.11	390227.3	3779790.7	10/25/2012	0.00084			0.0028	PPM				
				ENGINE2	2.37	390227.3	3779790.7	10/25/2012	0.00094			0.0029	PPM				
				ENGINE3	2.62	390227.3	3779790.7	10/25/2012	0.00104			0.0030	PPM				
				ENGINE4	3.66	390227.3	3779790.7	10/25/2012	0.00146			0.0035	PPM				
				REGEN	0.80	390009.0	3779758.0	12/31/2014	0.00032			0.0023	PPM				
				FLARE12	9.53	390041.0	3779818.0	5/25/2012	0.00379			0.0058	PPM				
SO_2 NAAQS																	
Scholl Canyon SO2 ICE 1hr Model	SO2	4TH-HIGHEST MAX DAILY 1-HR	4TH	ALL	30.39	390041.0	3779818.0	5 YEARS	0.01208	0.0094	PPM	0.0215	PPM	0.075	PPM		PPM
				ENGINE1	4.18	390227.3	3779790.7	5 YEARS	0.00166			0.0111	PPM				
				ENGINE2	4.38	390239.0	3779803.0	5 YEARS	0.00174			0.0111	PPM				
				ENGINE3	5.21	390239.0	3779803.0	5 YEARS	0.00207			0.0115	PPM				
				ENGINE4	7.12	390227.3	3779790.7	5 YEARS	0.00283			0.0122	PPM				
				REGEN	1.68	390050.0	3779750.0	5 YEARS	0.00067			0.0101	PPM				
				FLARE12	30.34	390041.0	3779818.0	5 YEARS	0.01206			0.0215	PPM				

CO 1 Hour NAAQS = Not to be exceeded more than once per year. Design values based on highest 1 hour model result over 5 years and highest 1 hour monitored background 2017 - 2019.

CO 1 Hour SCAQMD = Not to be exceeded. Design values based on highest 1 hour model result over 5 years and highest 1 hour monitored background 2017 - 2019.

CO 8 Hour NAAQS = Not to be exceeded more than once per year. Design values based on highest 8 hour model result over 5 years and highest 8 hour monitored background 2017 - 2019.

CO 8 Hour SCAQMD = Not to be exceeded. Design values based on highest 8 hour model result over 5 years and highest 8 hour monitored background 2017 - 2019.

NO2 1 Hour NAAQS = 98th percentile of 1-hour daily maximum concentrations, averaged over 3 years (approx 8th highest). Design value based on 98th percentile of 1-hour daily maximum concentrations, averaged over 5 years and the highest 98th percentile monitored concentration for years 2017-2019.

NO2 1 Hour SCAQMD = Not to be exceeded. Design values based on highest 1 hour model result over 5 years and highest 1 hour monitored background 2017 - 2019.

PM10/PM2.5 24 Hour SCAQMD = Not to exceeded significant threshold. Design value based on 1st highest max 5 year model result.

PM10 24 Hour NAAQS = Not to be exceeded more than once per year on average over 3 years (2nd Highest). Design value based on 6th highest max 5 year model result and highest monitored background 2017-2019.

PM2.5 24 Hour NAAQS = 98th percentile, averaged over 3 years (8th highest not including secondary). Design value based on 98th percentile, averaged over 5 years, and the highest 98th percentile 24 hour monitored background 2017 - 2019. No secondary emissions included.

SO2 1 Hour NAAQS = 99th percentile of 1-hour daily maximum concentrations, averaged over 3 years (approx 4th highest). Design value based on 99th percentile of 1-hour daily maximum concentrations, averaged over 5 years and the highest 99th percentile 1 hour monitored background 2017 - 2019.

SO2 1 Hour SCAQMD = Not to be exceeded. Design values based on highest 1 hour model result over 5 years and highest 1 hour monitored background 2017 - 2019.

SO2 24 Hour SCAQMD = Not to be exceeded. Design values based on highest 24 hour model result over 5 years and highest 24 hour monitored background 2017 - 2019.

Description	Pollutant	Averaging Period	Highest	Source Group	Conc (ug/m3)	UTME	UTMN	Conc Date	Conc (ppm)	Background	Unit	Total	Unit	NAAQS	Unit	SCAQMD	Unit
NO_2 State Standard/NAAQS Normal Operations - ARM																	
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	ALL	2.915	390041.0	3779818.0	2012	0.00161	0.0154	PPM	0.0170	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	ALL	2.990	390041.0	3779818.0	2013	0.00165			0.0171	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	ALL	3.156	390041.0	3779818.0	2014	0.00175			0.0171	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	ALL	2.731	390041.0	3779818.0	2015	0.00151			0.0169	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	ALL	3.412	390041.0	3779818.0	2016	0.00189			0.0173	PPM				
								5 Year Max	**0.00189**			**0.0173**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	ENGINE1	0.352	390100.0	3780000.0	2012	0.000195	0.0154	PPM	0.0156	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	ENGINE1	0.352	390100.0	3780000.0	2013	0.000194			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	ENGINE1	0.358	390100.0	3780000.0	2014	0.000198			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	ENGINE1	0.332	390100.0	3780000.0	2015	0.000183			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	ENGINE1	0.360	390100.0	3780000.0	2016	0.000199			0.0156	PPM				
								5 Year Max	**0.000199**			**0.0156**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	ENGINE2	0.345	390100.0	3780000.0	2012	0.000191	0.0154	PPM	0.0156	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	ENGINE2	0.349	390150.0	3780000.0	2013	0.000193			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	ENGINE2	0.350	390100.0	3780000.0	2014	0.000193			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	ENGINE2	0.324	390100.0	3780000.0	2015	0.000179			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	ENGINE2	0.351	390100.0	3780000.0	2016	0.000194			0.0156	PPM				
								5 Year Max	**0.000194**			**0.0156**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	ENGINE3	0.346	390150.0	3779950.0	2012	0.000192	0.0154	PPM	0.0156	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	ENGINE3	0.358	390150.0	3779950.0	2013	0.000198			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	ENGINE3	0.353	390150.0	3780000.0	2014	0.000195			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	ENGINE3	0.338	390227.3	3779790.7	2015	0.000187			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	ENGINE3	0.355	390150.0	3780000.0	2016	0.000197			0.0156	PPM				
								5 Year Max	**0.000198**			**0.0156**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	ENGINE4	0.391	390227.3	3779790.7	2012	0.000217	0.0154	PPM	0.0156	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	ENGINE4	0.365	390150.0	3779950.0	2013	0.000202			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	ENGINE4	0.362	390150.0	3779950.0	2014	0.000200			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	ENGINE4	0.408	390227.3	3779790.7	2015	0.000226			0.0156	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	ENGINE4	0.368	390227.3	3779790.7	2016	0.000203			0.0156	PPM				
								5 Year Max	**0.000226**			**0.0156**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	REGEN	0.092	390050.0	3779900.0	2012	0.0000507	0.0154	PPM	0.0155	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	REGEN	0.096	390050.0	3779900.0	2013	0.0000530			0.0155	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	REGEN	0.095	390050.0	3779900.0	2014	0.0000527			0.0155	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	REGEN	0.088	390050.0	3779900.0	2015	0.0000487			0.0154	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	REGEN	0.096	390050.0	3779900.0	2016	0.0000529			0.0155	PPM				
								5 Year Max	**0.000053**			**0.0155**	**PPM**				
Scholl Canyon ICE AnnualElevation_2008_NO2	NO2	ANNUAL	1ST	FLARE12	2.447	390041.0	3779818.0	2012	0.001354	0.0154	PPM	0.0168	PPM	0.053	PPM	0.03	PPM
Scholl Canyon ICE AnnualElevation_2009_NO2	NO2	ANNUAL	1ST	FLARE12	2.539	390041.0	3779818.0	2013	0.001404			0.0168	PPM				
Scholl Canyon ICE AnnualElevation_2010_NO2	NO2	ANNUAL	1ST	FLARE12	2.691	390041.0	3779818.0	2014	0.001488			0.0169	PPM				
Scholl Canyon ICE AnnualElevation_2011_NO2	NO2	ANNUAL	1ST	FLARE12	2.291	390041.0	3779818.0	2015	0.001267			0.0167	PPM				
Scholl Canyon ICE AnnualElevation_2012_NO2	NO2	ANNUAL	1ST	FLARE12	3.005	390041.0	3779818.0	2016	0.001663			0.0171	PPM				
								5 Year Max	**0.001663**			**0.0171**	**PPM**				

Description	Pollutant	Averaging Period	Highest	Source Group	Conc (ug/m3)	UTME	UTMN	Conc Date	Conc (ppm)	Background	Unit	Total	Unit	NAAQS	Unit	SCAQMD	Unit
PM10/PM2.5 State Standard Normal																	
Scholl Canyon ICE AnnualElevation_2008_PM	PM10, PM2.5	ANNUAL	1ST	ALL	1.505	390041.0	3779818.0	2012				1.505	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE AnnualElevation_2009_PM	PM10, PM2.5	ANNUAL	1ST	ALL	1.547	390041.0	3779818.0	2013				1.547	UG/M3				
Scholl Canyon ICE AnnualElevation_2010_PM	PM10, PM2.5	ANNUAL	1ST	ALL	1.634	390041.0	3779818.0	2014				1.634	UG/M3				
Scholl Canyon ICE AnnualElevation_2011_PM	PM10, PM2.5	ANNUAL	1ST	ALL	1.410	390041.0	3779818.0	2015				1.410	UG/M3				
Scholl Canyon ICE AnnualElevation_2012_PM	PM10, PM2.5	ANNUAL	1ST	ALL	1.779	390041.0	3779818.0	2016				1.779	UG/M3				
				5 Year Average	**1.575**							**1.575**	**UG/M3**				
Scholl Canyon ICE Annual_2008_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE1	0.145	390100.0	3780000.0	2012				0.1454	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE Annual_2009_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE1	0.145	390100.0	3780000.0	2013				0.1450	UG/M3				
Scholl Canyon ICE Annual_2010_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE1	0.148	390100.0	3780000.0	2014				0.1476	UG/M3				
Scholl Canyon ICE Annual_2011_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE1	0.137	390100.0	3780000.0	2015				0.1368	UG/M3				
Scholl Canyon ICE Annual_2012_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE1	0.148	390100.0	3780000.0	2016				0.1484	UG/M3				
				5 Year Average	**0.145**							**0.1446**	**UG/M3**				
Scholl Canyon ICE Annual_2008_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE2	0.142	390100.0	3780000.0	2012				0.1425	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE Annual_2009_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE2	0.144	390150.0	3780000.0	2013				0.1440	UG/M3				
Scholl Canyon ICE Annual_2010_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE2	0.144	390100.0	3780000.0	2014				0.1443	UG/M3				
Scholl Canyon ICE Annual_2011_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE2	0.134	390100.0	3780000.0	2015				0.1337	UG/M3				
Scholl Canyon ICE Annual_2012_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE2	0.145	390100.0	3780000.0	2016				0.1448	UG/M3				
				5 Year Average	**0.142**							**0.1418**	**UG/M3**				
Scholl Canyon ICE AnnualElevation_2008_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE3	0.143	390150.0	3779950.0	2012				0.143	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE AnnualElevation_2009_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE3	0.148	390150.0	3779950.0	2013				0.148	UG/M3				
Scholl Canyon ICE AnnualElevation_2010_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE3	0.146	390150.0	3780000.0	2014				0.146	UG/M3				
Scholl Canyon ICE AnnualElevation_2011_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE3	0.139	390227.3	3779790.7	2015				0.139	UG/M3				
Scholl Canyon ICE AnnualElevation_2012_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE3	0.147	390150.0	3780000.0	2016				0.147	UG/M3				
				5 Year Average	**0.144**							**0.144**	**UG/M3**				
Scholl Canyon ICE AnnualElevation_2008_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE4	0.161	390227.3	3779790.7	2012				0.161	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE AnnualElevation_2009_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE4	0.150	390150.0	3779950.0	2013				0.150	UG/M3				
Scholl Canyon ICE AnnualElevation_2010_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE4	0.149	390150.0	3779950.0	2014				0.149	UG/M3				
Scholl Canyon ICE AnnualElevation_2011_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE4	0.168	390227.3	3779790.7	2015				0.168	UG/M3				
Scholl Canyon ICE AnnualElevation_2012_PM	PM10, PM2.5	ANNUAL	1ST	ENGINE4	0.152	390227.3	3779790.7	2016				0.152	UG/M3				
				5 Year Average	**0.156**							**0.156**	**UG/M3**				
Scholl Canyon ICE AnnualElevation_2008_PM	PM10, PM2.5	ANNUAL	1ST	REGEN	0.068	390050.0	3779900.0	2012				0.068	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE AnnualElevation_2009_PM	PM10, PM2.5	ANNUAL	1ST	REGEN	0.071	390050.0	3779900.0	2013				0.071	UG/M3				
Scholl Canyon ICE AnnualElevation_2010_PM	PM10, PM2.5	ANNUAL	1ST	REGEN	0.071	390050.0	3779900.0	2014				0.071	UG/M3				
Scholl Canyon ICE AnnualElevation_2011_PM	PM10, PM2.5	ANNUAL	1ST	REGEN	0.066	390050.0	3779900.0	2015				0.066	UG/M3				
Scholl Canyon ICE AnnualElevation_2012_PM	PM10, PM2.5	ANNUAL	1ST	REGEN	0.071	390050.0	3779900.0	2016				0.071	UG/M3				
				5 Year Average	**0.070**							**0.070**	**UG/M3**				
Scholl Canyon ICE AnnualElevation_2008_PM	PM10, PM2.5	ANNUAL	1ST	FLARE12	1.311	390041.0	3779818.0	2012				1.311	UG/M3	Non-Attainment PM2.5 SIL - 0.2	UG/M3	Threshold PM10 - 1.0 PM2.5 - 1.0	UG/M3
Scholl Canyon ICE AnnualElevation_2009_PM	PM10, PM2.5	ANNUAL	1ST	FLARE12	1.360	390041.0	3779818.0	2013				1.360	UG/M3				
Scholl Canyon ICE AnnualElevation_2010_PM	PM10, PM2.5	ANNUAL	1ST	FLARE12	1.442	390041.0	3779818.0	2014				1.442	UG/M3				
Scholl Canyon ICE AnnualElevation_2011_PM	PM10, PM2.5	ANNUAL	1ST	FLARE12	1.228	390041.0	3779818.0	2015				1.228	UG/M3				
Scholl Canyon ICE AnnualElevation_2012_PM	PM10, PM2.5	ANNUAL	1ST	FLARE12	1.611	390041.0	3779818.0	2016				1.611	UG/M3				
				5 Year Average	**1.390**							**1.390**	**UG/M3**				

NO2 Annual NAAQS = Annual mean. Design value based on highest annual mean over 5 years of model result and highest annual monitored background 2017 - 2019. ARM Method = 80% of model results.

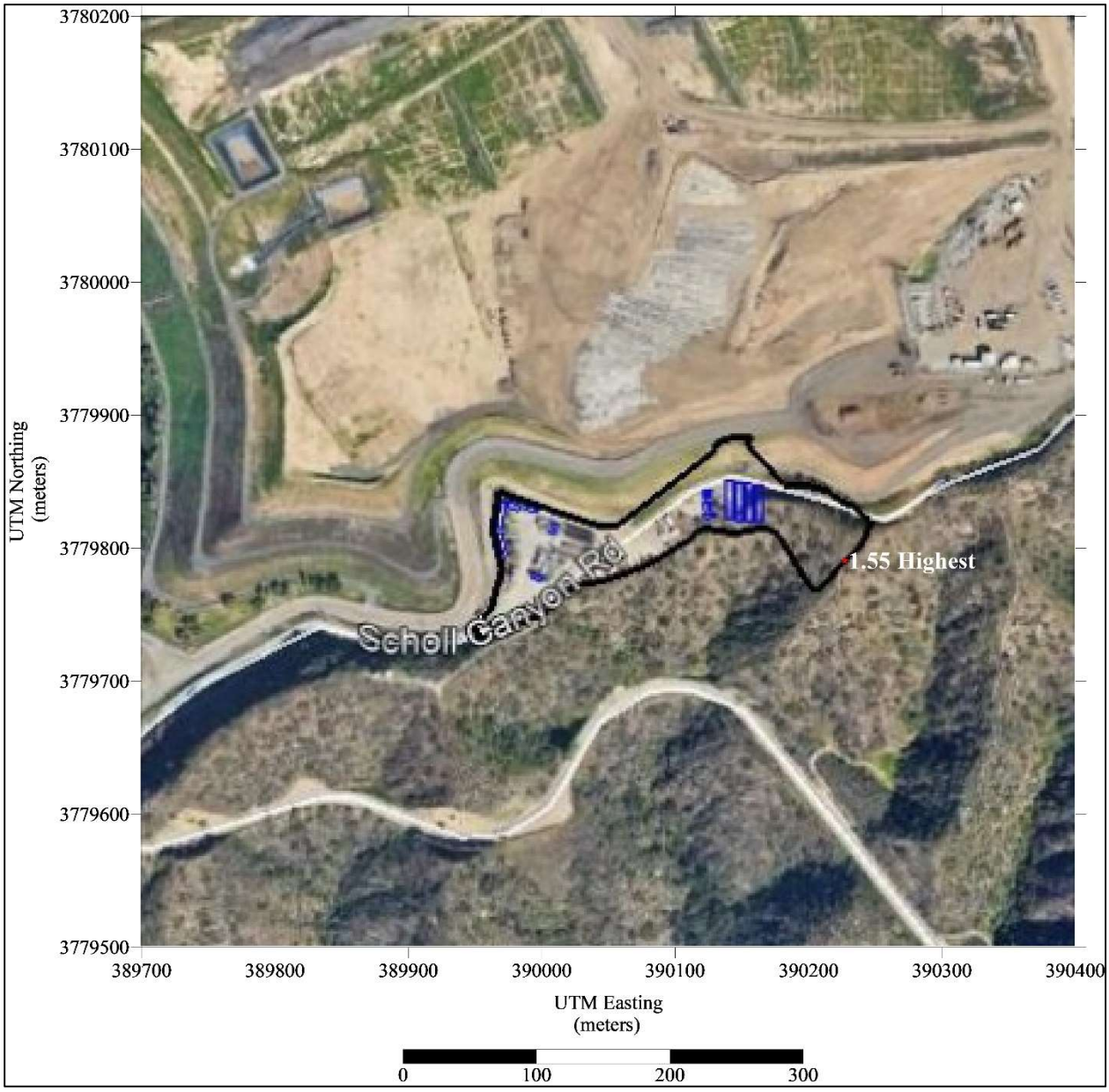
PM10/PM2.5 Annual SCAQMD = Not to exceeded significant threshold. Design value based on the 5 year average of annual mean model result.

PM Annual NAAQS = Equal to the annual mean averaged over 3 years. Design value based on the 5 year average of annual mean model result and highest annual monitored background 2017 - 2019.

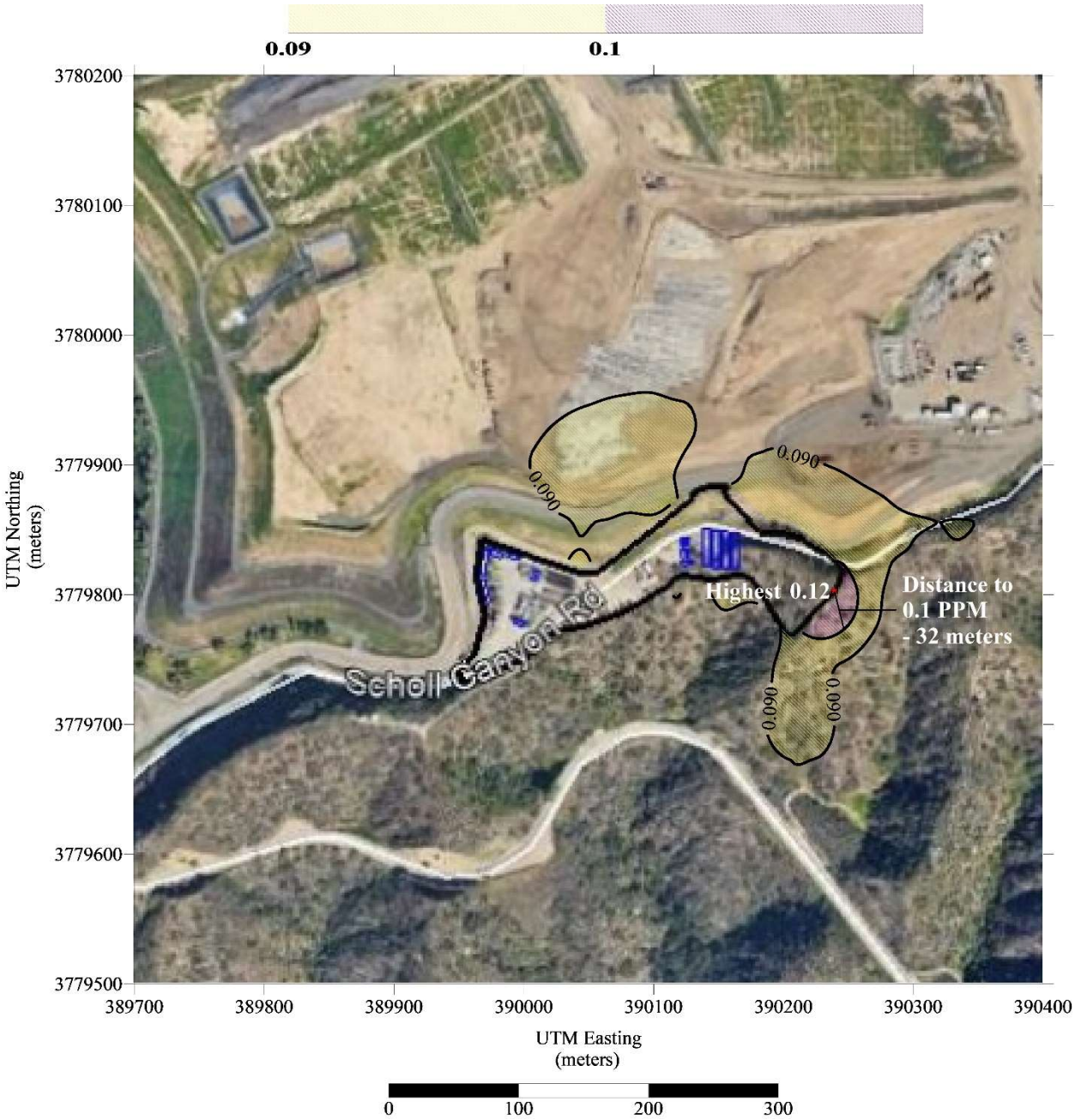
POST LANDFILL CLOSURE

SITE MAPS SHOWING THE LOCATIONS OF MODELING RESULTS

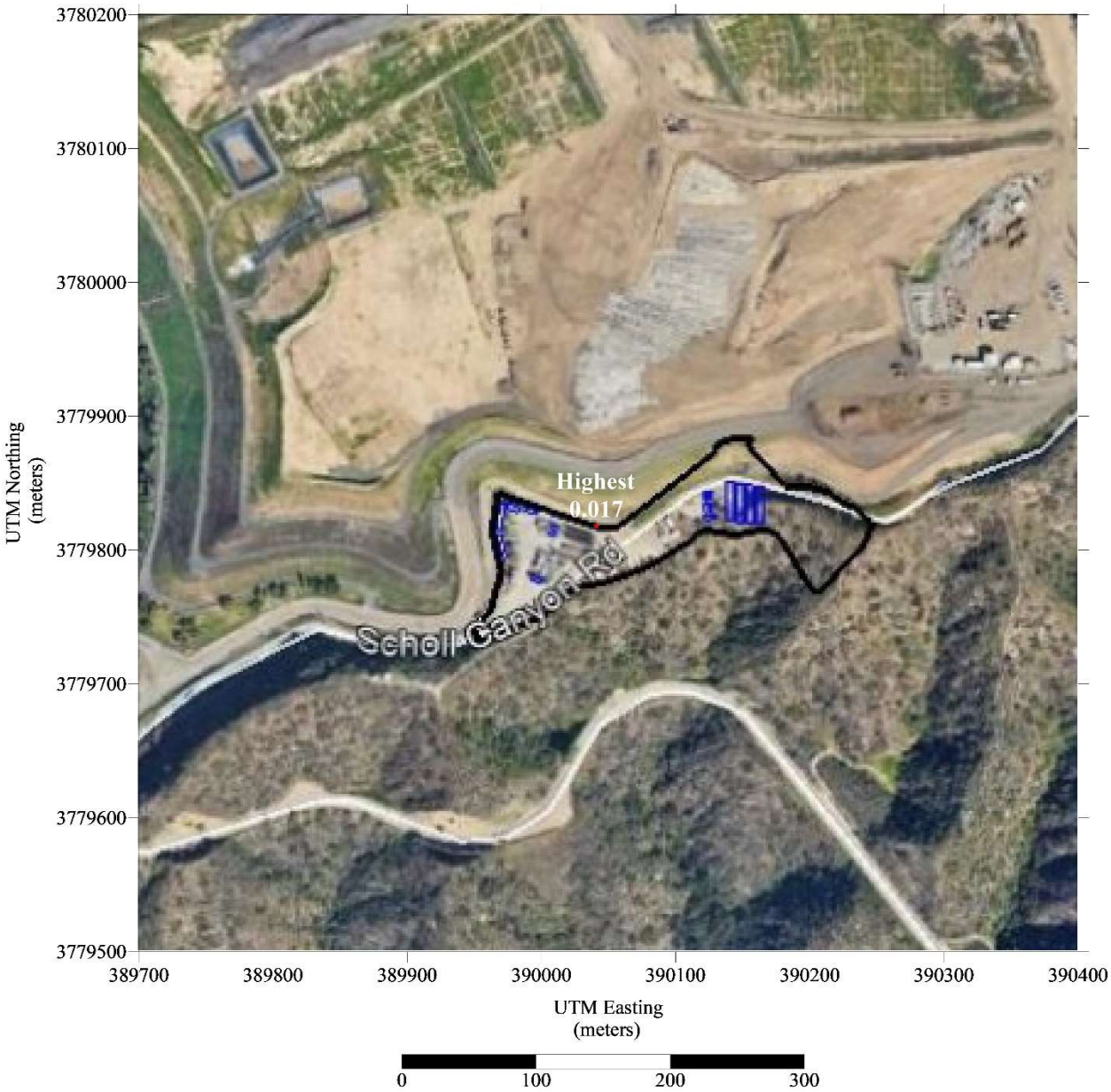
AERMOD Output for 1st highest 1-Hourly NO_2 Concentrations (in ppm)



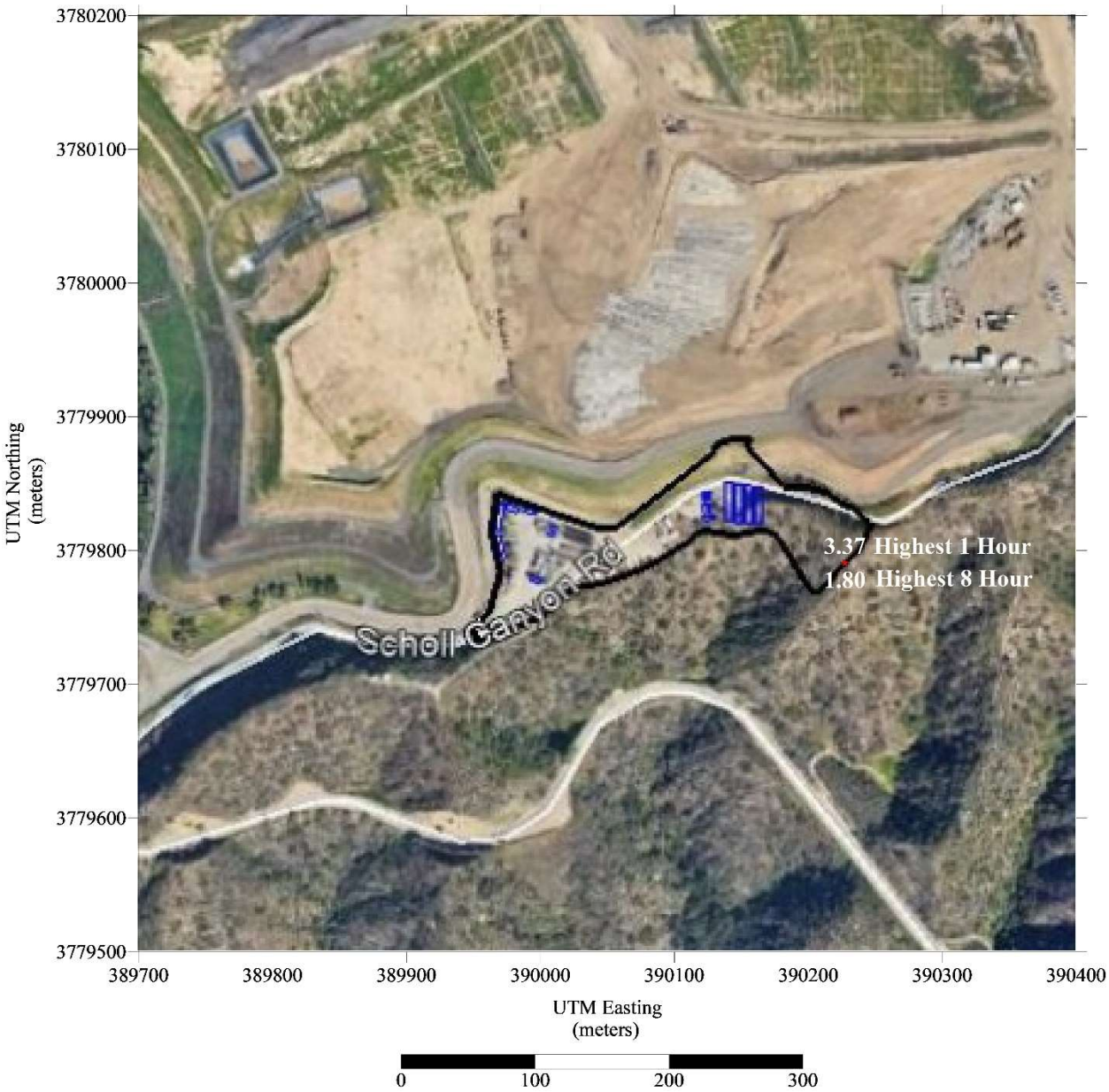
AERMOD Output for 8th highest 1-hourly NO2 Concentrations (ppm)



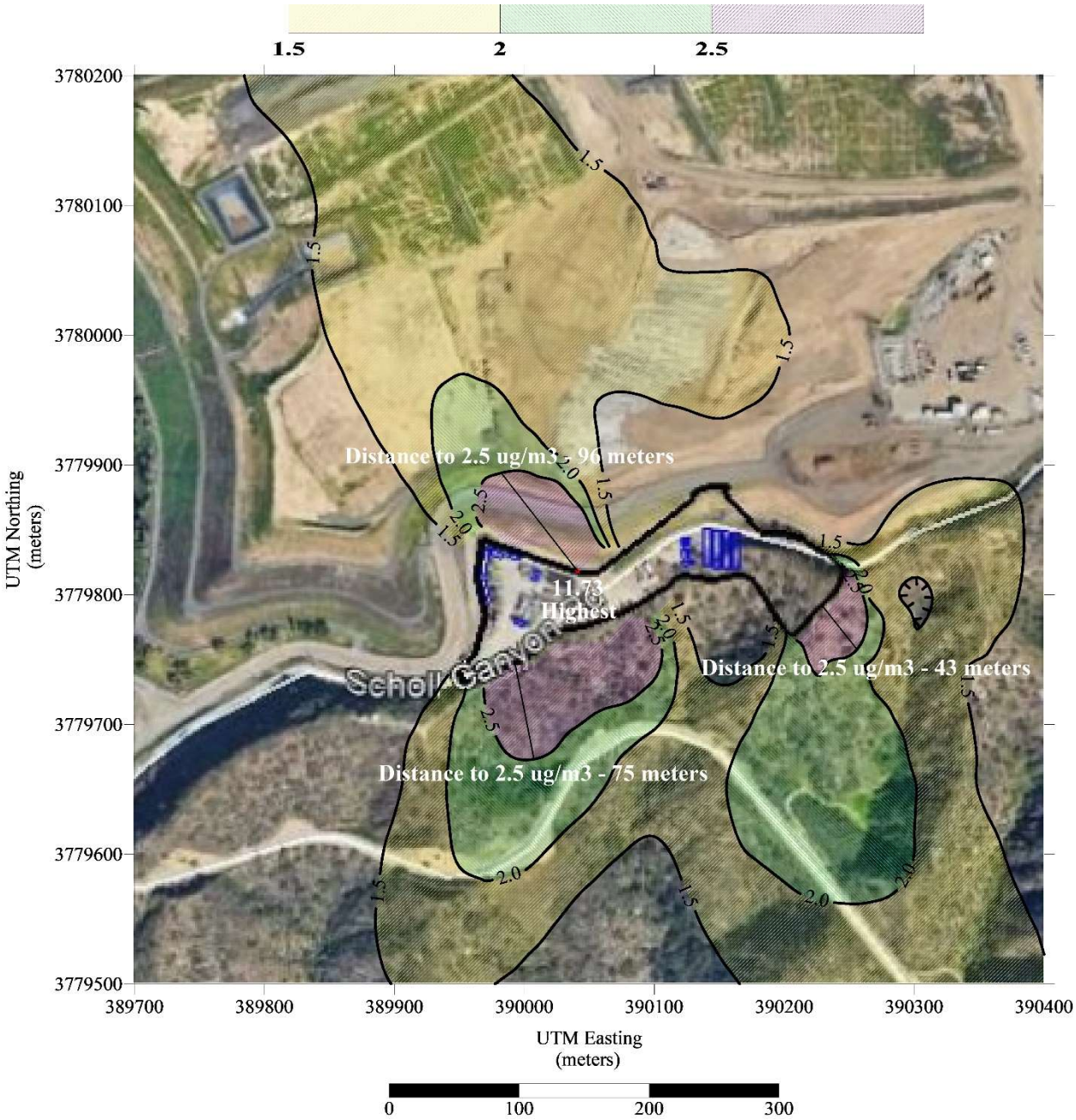
AERMOD Output for Annual NO_2 Concentrations (in ppm)



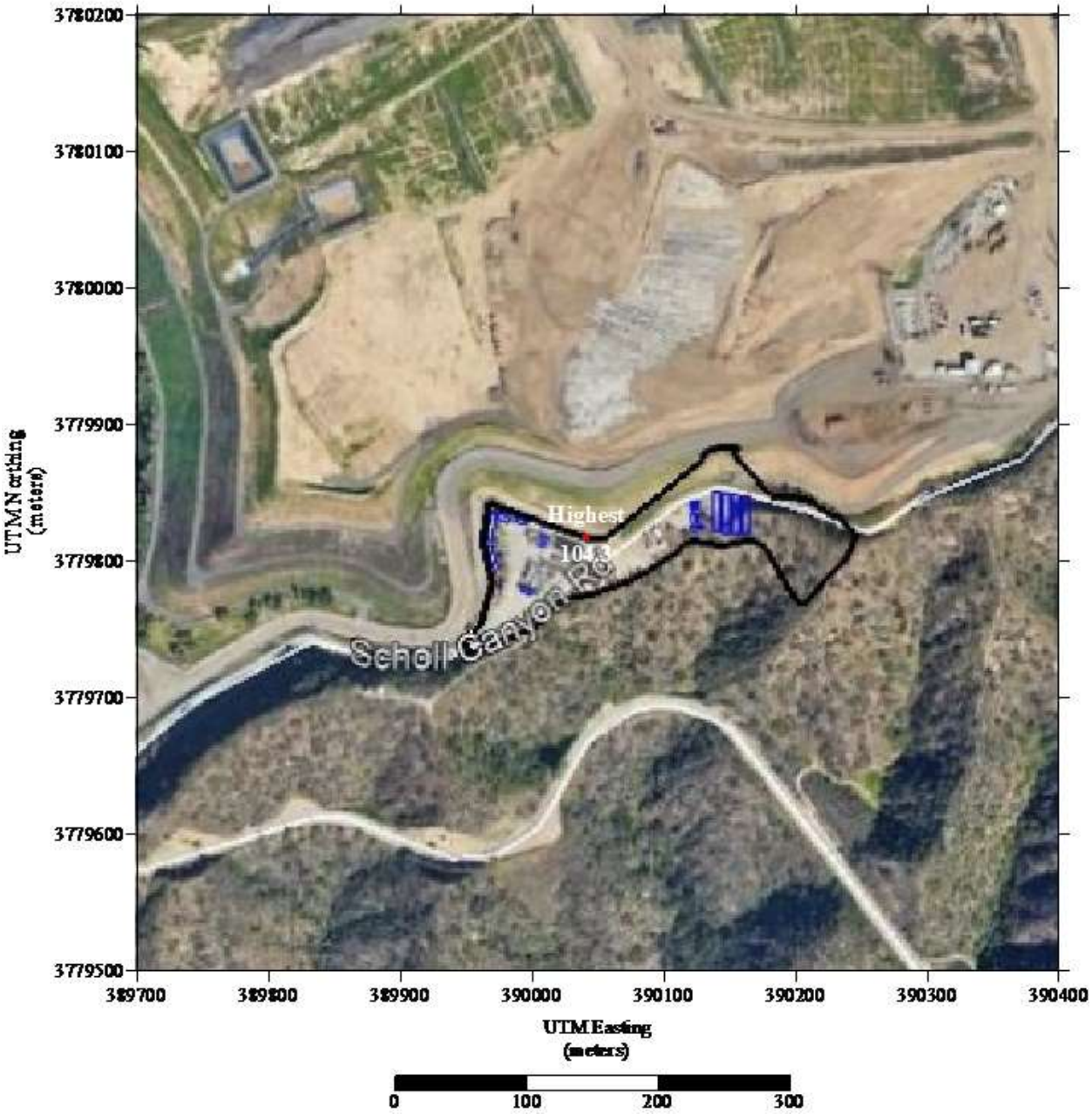
AERMOD Output for 1st Highest 1-Hourly and 8-Hourly CO Concentrations (in ppm)



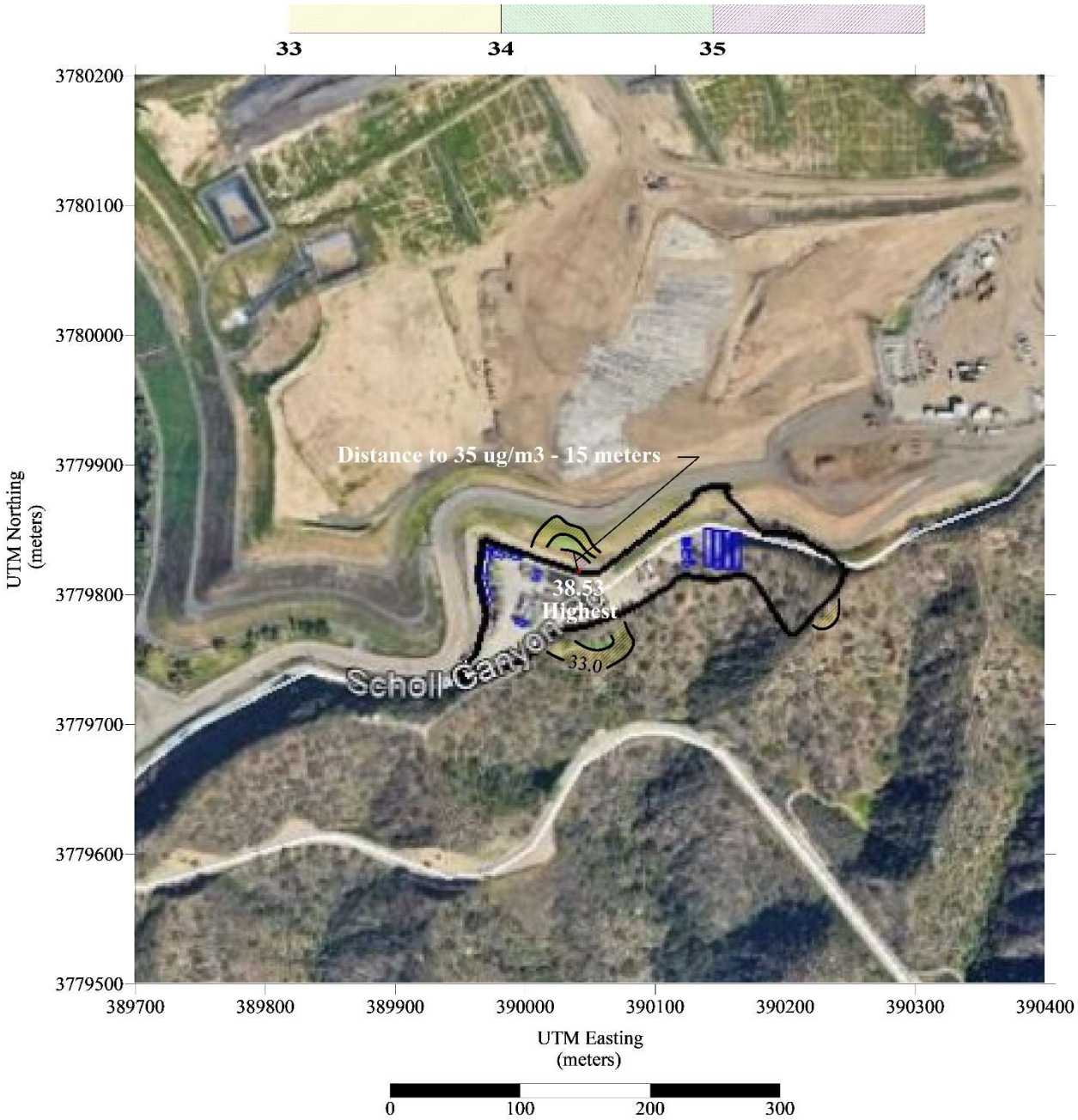
AERMOD Output for 1st Highest 24-hour PM10 Concentrations (µg/m³)



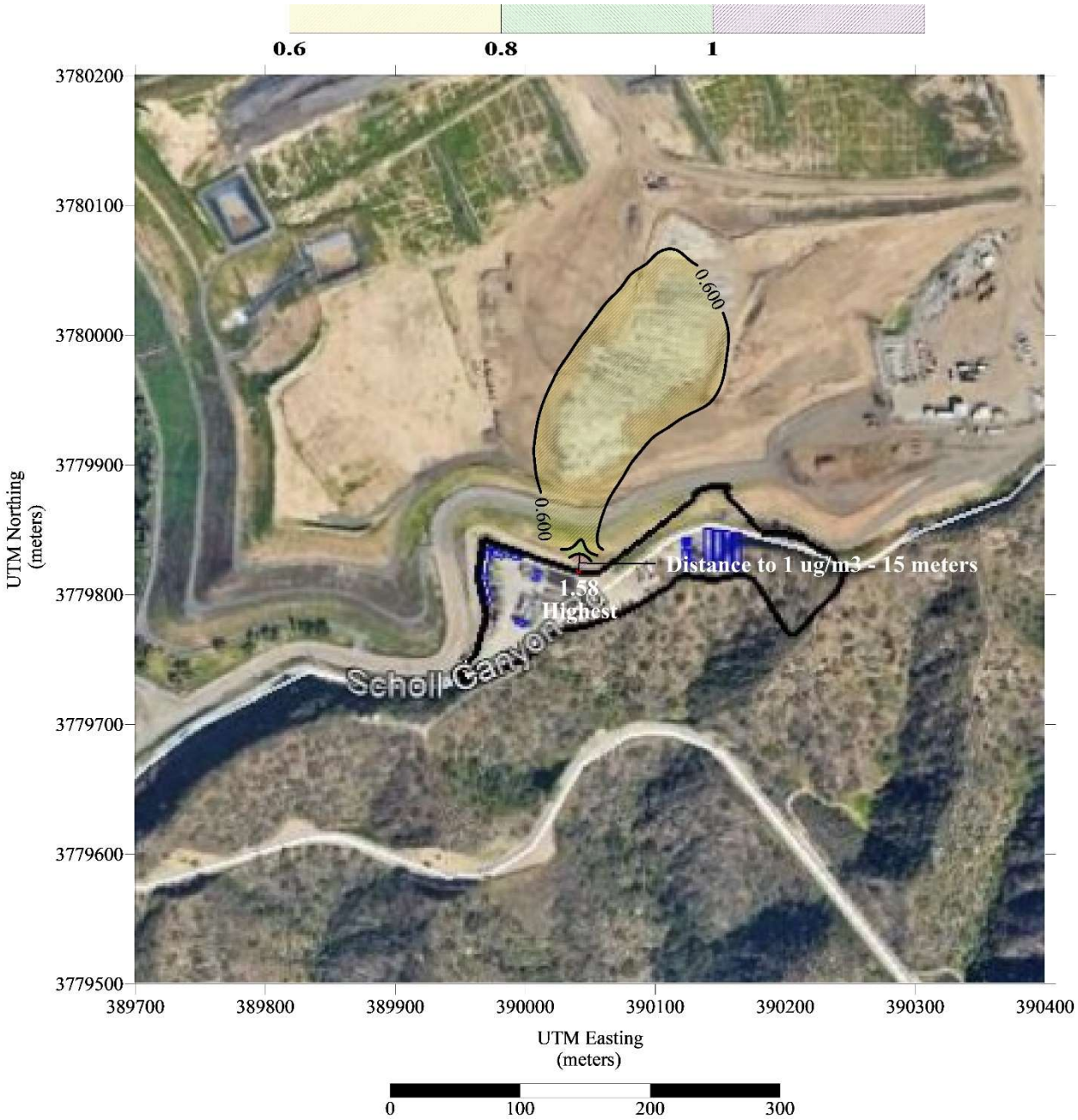
AERMOD Output for 6th Highest 24-hour PM10 Concentrations (µg/m³)



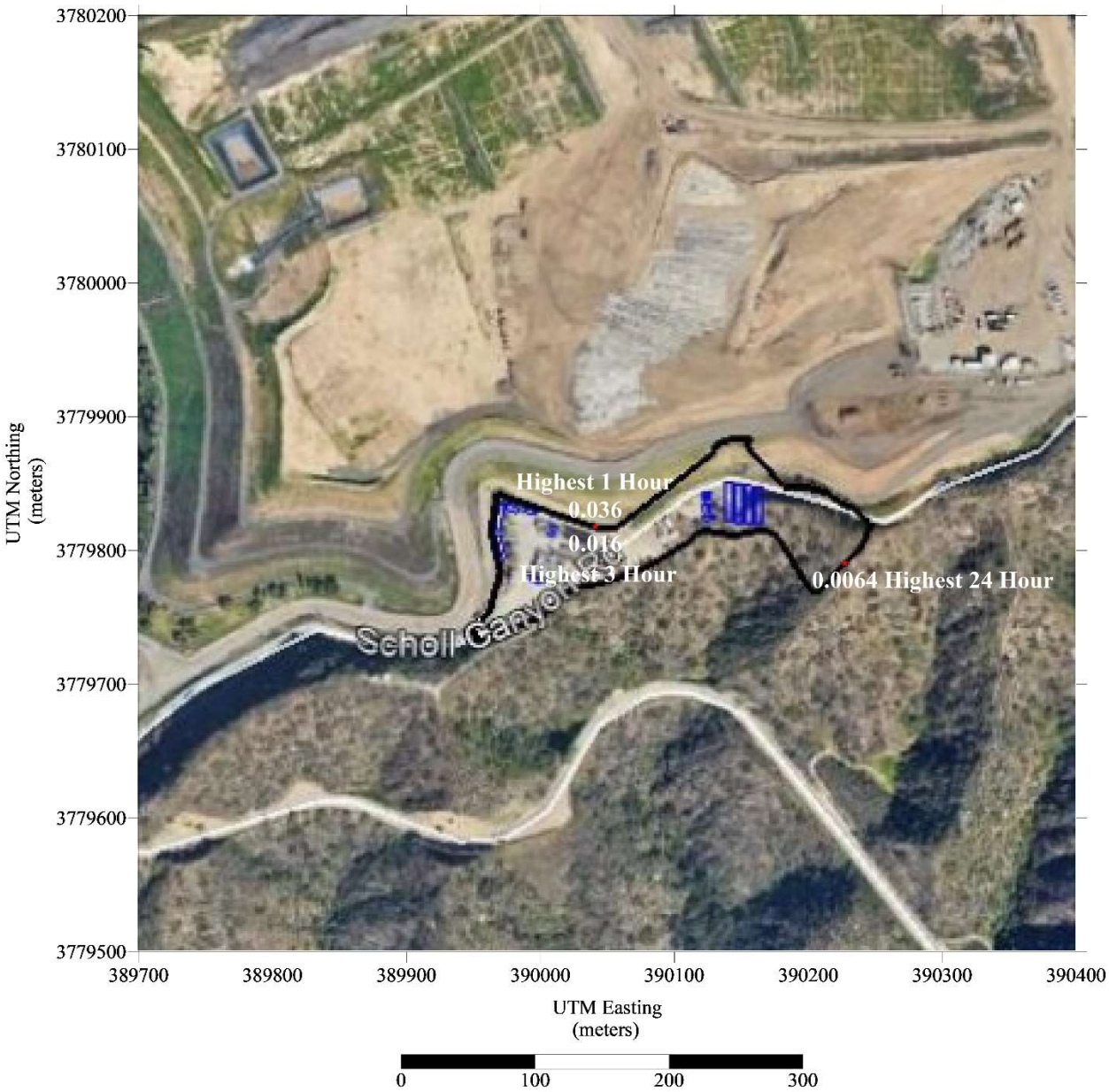
AERMOD Output for 8th Highest 24-hour PM2.5 Concentrations (µg/m³)



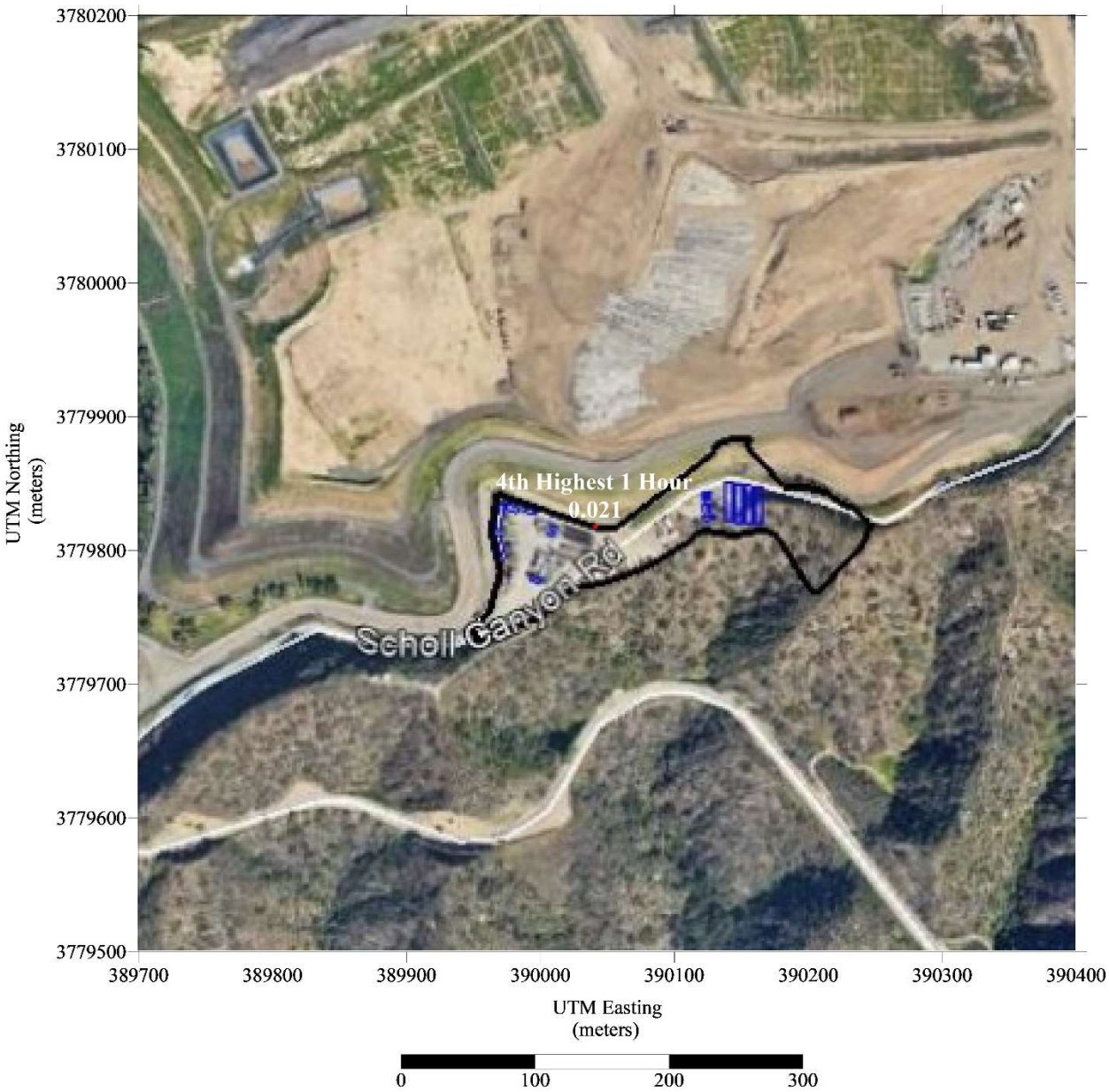
AERMOD Output for Annual Average PM10/PM2.5 Concentrations (µg/m³)



AERMOD Output for 1st highest 1-hour and 24-hour SO_2 Concentrations (ppm)



AERMOD Output for 4th highest 1-hour SO_2 Concentrations (ppm)



Errata Attachment C: Updated Project Health Risk Assessment Information

HRA RESULTS
(THE HIGHEST VALUES)

CANCER RISK

*HARP - HRACalc v21081 5/4/2021 11:06:29 AM - Cancer Risk - Input File: C:\Work\Bee\Glendale CA\Scholl Canyon 2021\HRA\Outer\SCHOLL CANYON LARGE BORDER 2021\hra\CancerHRAInput.hra

REC	GRP	NETID	X	Y	RISK_SUM	SCENARIO	INH_RISK	SOIL_RISK	DERMAL_RISK	MMILK_RISK	WATER_RISK	FISH_RISK	CROP_RISK	BEEF_RISK	DAIRY_RISK	PIG_RISK	CHICKEN_RISK	EGG_RISK
43	ALL		389940	3780593.5	2.64E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.64E-07	7.44E-13	4.21E-14	8.89E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
42	ALL		389918	3780577	2.61E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.61E-07	7.44E-13	4.21E-14	8.89E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
44	ALL		389962	3780610	2.60E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.60E-07	7.26E-13	4.11E-14	8.68E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3880	ALL		389950	3780650	2.51E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.51E-07	6.92E-13	3.92E-14	8.27E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3879	ALL		389900	3780650	2.45E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.45E-07	6.75E-13	3.82E-14	8.07E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3810	ALL		389900	3780600	2.45E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.45E-07	7.00E-13	3.97E-14	8.37E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
45	ALL		389979	3780651	2.37E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.37E-07	6.62E-13	3.75E-14	7.91E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
41	ALL		389884	3780608	2.34E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.34E-07	6.74E-13	3.81E-14	8.05E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3950	ALL		389950	3780700	2.31E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.31E-07	6.38E-13	3.61E-14	7.62E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3949	ALL		389900	3780700	2.29E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.29E-07	6.29E-13	3.56E-14	7.52E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3809	ALL		389850	3780600	2.28E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.28E-07	6.56E-13	3.72E-14	7.85E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
36	ALL		389759	3780447	2.24E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.24E-07	6.44E-13	3.64E-14	7.70E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
40	ALL		389848	3780578	2.23E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.23E-07	6.47E-13	3.66E-14	7.74E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
37	ALL		389767.5	3780482.5	2.22E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.22E-07	6.38E-13	3.61E-14	7.63E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3606	ALL		389750	3780450	2.21E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.21E-07	6.32E-13	3.58E-14	7.56E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
46	ALL		389980	3780686	2.19E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.19E-07	6.13E-13	3.47E-14	7.33E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3878	ALL		389850	3780650	2.18E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.18E-07	6.22E-13	3.52E-14	7.43E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
47	ALL		389977.5	3780719	2.17E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.17E-07	6.02E-13	3.41E-14	7.20E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
49	ALL		389941.5	3780738.5	2.11E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.11E-07	5.91E-13	3.35E-14	7.06E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
50	ALL		389908	3780725	2.11E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.11E-07	5.96E-13	3.37E-14	7.12E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3948	ALL		389850	3780700	2.10E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.10E-07	5.93E-13	3.36E-14	7.09E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
51	ALL		389884.5	3780758.5	2.10E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.10E-07	5.75E-13	3.26E-14	6.88E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3673	ALL		389750	3780500	2.09E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.09E-07	5.98E-13	3.39E-14	7.15E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3740	ALL		389800	3780550	2.08E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.08E-07	6.05E-13	3.43E-14	7.23E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
48	ALL		389975	3780752	2.07E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.07E-07	5.73E-13	3.25E-14	6.85E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
38	ALL		389776	3780518	2.03E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.03E-07	5.91E-13	3.35E-14	7.07E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
4017	ALL		389850	3780750	2.03E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.03E-07	5.63E-13	3.19E-14	6.73E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3808	ALL		389800	3780600	2.01E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	2.01E-07	5.83E-13	3.30E-14	6.97E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
35	ALL		389721	3780420.2	1.99E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.99E-07	5.77E-13	3.27E-14	6.90E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
39	ALL		389812	3780548	1.99E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.99E-07	5.83E-13	3.30E-14	6.97E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3739	ALL		389750	3780550	1.99E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.99E-07	5.70E-13	3.23E-14	6.82E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3605	ALL		389700	3780450	1.93E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.93E-07	5.53E-13	3.13E-14	6.61E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3672	ALL		389700	3780500	1.88E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.88E-07	5.36E-13	3.04E-14	6.41E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
4016	ALL		389800	3780750	1.85E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.85E-07	5.21E-13	2.95E-14	6.23E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3877	ALL		389800	3780650	1.81E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.81E-07	5.25E-13	2.97E-14	6.28E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
4082	ALL		389800	3780800	1.79E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.79E-07	4.87E-13	2.76E-14	5.82E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
53	ALL		389880.5	3780833	1.78E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.78E-07	4.79E-13	2.71E-14	5.73E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3807	ALL		389750	3780600	1.78E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.78E-07	5.16E-13	2.92E-14	6.17E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3947	ALL		389800	3780700	1.76E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.76E-07	5.09E-13	2.88E-14	6.09E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3538	ALL		389650	3780400	1.76E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.76E-07	5.08E-13	2.88E-14	6.08E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
20	ALL		389611.5	3780047.75	1.75E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.75E-07	5.34E-13	3.02E-14	6.39E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
21	ALL		389594	3780084	1.74E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.74E-07	5.29E-13	2.99E-14	6.32E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3738	ALL		389700	3780550	1.74E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.74E-07	4.99E-13	2.82E-14	5.96E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
4287	ALL		389950	3780950	1.72E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.72E-07	4.57E-13	2.59E-14	5.47E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
19	ALL		389629	3780011.5	1.72E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.72E-07	5.28E-13	2.99E-14	6.32E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
4288	ALL		390000	3780950	1.69E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.69E-07	4.42E-13	2.50E-14	5.29E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
52	ALL		389861	3780792	1.69E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.69E-07	4.59E-13	2.60E-14	5.49E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3604	ALL		389650	3780450	1.69E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.69E-07	4.86E-13	2.75E-14	5.81E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3090	ALL		389600	3780050	1.69E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.69E-07	5.16E-13	2.92E-14	6.17E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
22	ALL		389572.33	3780113.33	1.68E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.68E-07	5.09E-13	2.88E-14	6.09E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
4015	ALL		389750	3780750	1.67E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.67E-07	4.75E-13	2.69E-14	5.67E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
4081	ALL		389750	3780800	1.66E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.66E-07	4.50E-13	2.55E-14	5.38E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
18	ALL		389646.5	3779975.25	1.65E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.65E-07	5.09E-13	2.88E-14	6.08E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
57	ALL		389997	3780896	1.64E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.64E-07	4.26E-13	2.41E-14	5.10E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
23	ALL		389550.67	3780142.67	1.63E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.63E-07	4.89E-13	2.77E-14	5.85E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
4286	ALL		389900	3780950	1.62E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.62E-07	4.32E-13	2.44E-14	5.16E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
4218	ALL		390000	3780900	1.62E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.62E-07	4.22E-13	2.39E-14	5.05E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
34	ALL		389683	3780393.4	1.62E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.62E-07	4.66E-13	2.64E-14	5.57E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
33	ALL		389645	3780366.6	1.61E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.61E-07	4.65E-13	2.63E-14	5.56E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
4358	ALL		389950	3781000	1.60E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.60E-07	4.35E-13	2.46E-14	5.20E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
4357	ALL		389900	3781000	1.60E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.60E-07	4.38E-13	2.48E-14	5.24E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
56	ALL		389971	3780883	1.60E-07	30YrCancerDerived_InhSoilDermMMilkWater_FAH16to70	1.60E-07	4.22E-13	2.39E-14	5.05E-13	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

CHRONIC

*HARP - HRACalc v21081 5/4/2021 11:36:36 AM - Chronic Risk - Input File: C:\Work\Bee\Glendale CA\Scholl Canyon 2021\HRA\Outer\SCHOLL CANYON LARGE BORDER 2021\hra\ChronicHRAInput.hra

REC	GRP	NETID	X	Y	SCENARIO	CV	CNS	IMMUN	KIDNEY	GILV	REPRO/DEVEL	RESP	SKIN	EYE	BONE/TEETH	ENDO	BLOOD	ODOR	GENERAL	MAXHI
44	ALL		389962	3780610	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.72E-04	0.00E+00	3.71E-04	6.77E-07	3.74E-04	1.64E-02	0.00E+00	1.46E-06	0.00E+00	7.22E-08	2.04E-05	0.00E+00	0.00E+00	1.64E-02
3880	ALL		389950	3780650	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.73E-04	0.00E+00	3.71E-04	6.35E-07	3.74E-04	1.63E-02	0.00E+00	1.37E-06	0.00E+00	7.03E-08	1.99E-05	0.00E+00	0.00E+00	1.63E-02
43	ALL		389940	3780593.5	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.70E-04	0.00E+00	3.69E-04	6.89E-07	3.72E-04	1.63E-02	0.00E+00	1.48E-06	0.00E+00	7.30E-08	2.06E-05	0.00E+00	0.00E+00	1.63E-02
3879	ALL		389900	3780650	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.61E-04	0.00E+00	3.60E-04	6.04E-07	3.63E-04	1.59E-02	0.00E+00	1.29E-06	0.00E+00	6.84E-08	1.93E-05	0.00E+00	0.00E+00	1.59E-02
42	ALL		389918	3780577	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.53E-04	0.00E+00	3.52E-04	6.89E-07	3.55E-04	1.56E-02	0.00E+00	1.48E-06	0.00E+00	7.16E-08	2.01E-05	0.00E+00	0.00E+00	1.56E-02
45	ALL		389979	3780651	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.41E-04	0.00E+00	3.40E-04	6.25E-07	3.43E-04	1.50E-02	0.00E+00	1.35E-06	0.00E+00	6.60E-08	1.86E-05	0.00E+00	0.00E+00	1.50E-02
3950	ALL		389950	3780700	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.40E-04	0.00E+00	3.39E-04	5.91E-07	3.41E-04	1.49E-02	0.00E+00	1.27E-06	0.00E+00	6.45E-08	1.82E-05	0.00E+00	0.00E+00	1.49E-02
3949	ALL		389900	3780700	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.39E-04	0.00E+00	3.38E-04	5.67E-07	3.41E-04	1.49E-02	0.00E+00	1.21E-06	0.00E+00	6.40E-08	1.81E-05	0.00E+00	0.00E+00	1.49E-02
3810	ALL		389900	3780600	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.29E-04	0.00E+00	3.27E-04	6.50E-07	3.30E-04	1.45E-02	0.00E+00	1.40E-06	0.00E+00	6.71E-08	1.89E-05	0.00E+00	0.00E+00	1.45E-02
47	ALL		389977.5	3780719	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.18E-04	0.00E+00	3.17E-04	5.68E-07	3.19E-04	1.40E-02	0.00E+00	1.23E-06	0.00E+00	6.06E-08	1.71E-05	0.00E+00	0.00E+00	1.40E-02
46	ALL		389980	3780686	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.13E-04	0.00E+00	3.12E-04	5.82E-07	3.15E-04	1.38E-02	0.00E+00	1.26E-06	0.00E+00	6.09E-08	1.72E-05	0.00E+00	0.00E+00	1.38E-02
41	ALL		389884	3780608	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.11E-04	0.00E+00	3.10E-04	6.26E-07	3.13E-04	1.38E-02	0.00E+00	1.35E-06	0.00E+00	6.41E-08	1.80E-05	0.00E+00	0.00E+00	1.38E-02
51	ALL		389884.5	3780758.5	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.13E-04	0.00E+00	3.12E-04	5.17E-07	3.15E-04	1.37E-02	0.00E+00	1.11E-06	0.00E+00	5.87E-08	1.66E-05	0.00E+00	0.00E+00	1.37E-02
3809	ALL		389850	3780600	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.03E-04	0.00E+00	3.02E-04	6.08E-07	3.05E-04	1.34E-02	0.00E+00	1.31E-06	0.00E+00	6.25E-08	1.76E-05	0.00E+00	0.00E+00	1.34E-02
48	ALL		389975	3780752	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.03E-04	0.00E+00	3.02E-04	5.42E-07	3.04E-04	1.33E-02	0.00E+00	1.17E-06	0.00E+00	5.77E-08	1.63E-05	0.00E+00	0.00E+00	1.33E-02
49	ALL		389941.5	3780738.5	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	3.02E-04	0.00E+00	3.01E-04	5.54E-07	3.04E-04	1.33E-02	0.00E+00	1.20E-06	0.00E+00	5.87E-08	1.66E-05	0.00E+00	0.00E+00	1.33E-02
37	ALL		389767.5	3780482.5	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.97E-04	0.00E+00	2.96E-04	5.96E-07	2.99E-04	1.31E-02	0.00E+00	1.29E-06	0.00E+00	6.09E-08	1.71E-05	0.00E+00	0.00E+00	1.31E-02
36	ALL		389759	3780447	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.96E-04	0.00E+00	2.95E-04	6.06E-07	2.98E-04	1.31E-02	0.00E+00	1.31E-06	0.00E+00	6.12E-08	1.72E-05	0.00E+00	0.00E+00	1.31E-02
3606	ALL		389750	3780450	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.95E-04	0.00E+00	2.94E-04	5.96E-07	2.97E-04	1.30E-02	0.00E+00	1.29E-06	0.00E+00	6.04E-08	1.70E-05	0.00E+00	0.00E+00	1.30E-02
3878	ALL		389850	3780650	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.95E-04	0.00E+00	2.94E-04	5.75E-07	2.97E-04	1.30E-02	0.00E+00	1.24E-06	0.00E+00	5.98E-08	1.68E-05	0.00E+00	0.00E+00	1.30E-02
50	ALL		389908	3780725	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.95E-04	0.00E+00	2.94E-04	5.55E-07	2.97E-04	1.30E-02	0.00E+00	1.20E-06	0.00E+00	5.84E-08	1.65E-05	0.00E+00	0.00E+00	1.30E-02
4017	ALL		389850	3780750	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.96E-04	0.00E+00	2.95E-04	5.08E-07	2.97E-04	1.30E-02	0.00E+00	1.09E-06	0.00E+00	5.66E-08	1.60E-05	0.00E+00	0.00E+00	1.30E-02
3948	ALL		389850	3780700	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.95E-04	0.00E+00	2.94E-04	5.44E-07	2.96E-04	1.30E-02	0.00E+00	1.17E-06	0.00E+00	5.82E-08	1.64E-05	0.00E+00	0.00E+00	1.30E-02
40	ALL		389848	3780578	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.88E-04	0.00E+00	2.87E-04	6.03E-07	2.89E-04	1.27E-02	0.00E+00	1.30E-06	0.00E+00	6.06E-08	1.70E-05	0.00E+00	0.00E+00	1.27E-02
3673	ALL		389750	3780500	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.79E-04	0.00E+00	2.78E-04	5.62E-07	2.80E-04	1.23E-02	0.00E+00	1.21E-06	0.00E+00	5.71E-08	1.61E-05	0.00E+00	0.00E+00	1.23E-02
53	ALL		389880.5	3780833	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.80E-04	0.00E+00	2.79E-04	4.09E-07	2.81E-04	1.22E-02	0.00E+00	8.68E-07	0.00E+00	5.05E-08	1.43E-05	0.00E+00	0.00E+00	1.22E-02
4288	ALL		390000	3780950	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.79E-04	0.00E+00	2.78E-04	4.05E-07	2.80E-04	1.22E-02	0.00E+00	8.74E-07	0.00E+00	4.84E-08	1.37E-05	0.00E+00	0.00E+00	1.22E-02
4219	ALL		390100	3780900	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.79E-04	0.00E+00	2.78E-04	3.56E-07	2.80E-04	1.21E-02	0.00E+00	7.74E-07	0.00E+00	4.50E-08	1.29E-05	0.00E+00	0.00E+00	1.21E-02
61	ALL		390125	3780894	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.78E-04	0.00E+00	2.77E-04	3.56E-07	2.79E-04	1.21E-02	0.00E+00	7.80E-07	0.00E+00	4.44E-08	1.27E-05	0.00E+00	0.00E+00	1.21E-02
60	ALL		390091	3780899	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.76E-04	0.00E+00	2.75E-04	3.52E-07	2.77E-04	1.20E-02	0.00E+00	7.64E-07	0.00E+00	4.48E-08	1.28E-05	0.00E+00	0.00E+00	1.20E-02
4287	ALL		389950	3780950	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.74E-04	0.00E+00	2.73E-04	4.14E-07	2.76E-04	1.20E-02	0.00E+00	8.92E-07	0.00E+00	4.88E-08	1.39E-05	0.00E+00	0.00E+00	1.20E-02
4082	ALL		389800	3780800	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.72E-04	0.00E+00	2.71E-04	4.25E-07	2.73E-04	1.19E-02	0.00E+00	9.05E-07	0.00E+00	5.03E-08	1.42E-05	0.00E+00	0.00E+00	1.19E-02
57	ALL		389997	3780896	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.72E-04	0.00E+00	2.72E-04	3.73E-07	2.74E-04	1.19E-02	0.00E+00	7.97E-07	0.00E+00	4.69E-08	1.33E-05	0.00E+00	0.00E+00	1.19E-02
3739	ALL		389750	3780550	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.68E-04	0.00E+00	2.67E-04	5.34E-07	2.70E-04	1.18E-02	0.00E+00	1.15E-06	0.00E+00	5.47E-08	1.54E-05	0.00E+00	0.00E+00	1.18E-02
3740	ALL		389800	3780550	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.67E-04	0.00E+00	2.66E-04	5.67E-07	2.69E-04	1.18E-02	0.00E+00	1.22E-06	0.00E+00	5.65E-08	1.59E-05	0.00E+00	0.00E+00	1.18E-02
4218	ALL		390000	3780900	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.70E-04	0.00E+00	2.69E-04	3.69E-07	2.71E-04	1.18E-02	0.00E+00	7.89E-07	0.00E+00	4.65E-08	1.32E-05	0.00E+00	0.00E+00	1.18E-02
4289	ALL		390050	3780950	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.70E-04	0.00E+00	2.69E-04	3.59E-07	2.71E-04	1.17E-02	0.00E+00	7.76E-07	0.00E+00	4.50E-08	1.28E-05	0.00E+00	0.00E+00	1.17E-02
3808	ALL		389800	3780600	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.63E-04	0.00E+00	2.62E-04	5.45E-07	2.64E-04	1.16E-02	0.00E+00	1.17E-06	0.00E+00	5.49E-08	1.54E-05	0.00E+00	0.00E+00	1.16E-02
38	ALL		389776	3780518	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.61E-04	0.00E+00	2.60E-04	5.56E-07	2.62E-04	1.15E-02	0.00E+00	1.20E-06	0.00E+00	5.52E-08	1.55E-05	0.00E+00	0.00E+00	1.15E-02
58	ALL		390023	3780909	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.64E-04	0.00E+00	2.63E-04	3.55E-07	2.65E-04	1.15E-02	0.00E+00	7.60E-07	0.00E+00	4.49E-08	1.28E-05	0.00E+00	0.00E+00	1.15E-02
35	ALL		389721	3780420.2	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.60E-04	0.00E+00	2.59E-04	5.52E-07	2.61E-04	1.15E-02	0.00E+00	1.20E-06	0.00E+00	5.43E-08	1.53E-05	0.00E+00	0.00E+00	1.15E-02
4290	ALL		390100	3780950	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.62E-04	0.00E+00	2.62E-04	3.38E-07	2.63E-04	1.14E-02	0.00E+00	7.35E-07	0.00E+00	4.26E-08	1.22E-05	0.00E+00	0.00E+00	1.14E-02
3605	ALL		389700	3780450	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.57E-04	0.00E+00	2.56E-04	5.30E-07	2.59E-04	1.14E-02	0.00E+00	1.15E-06	0.00E+00	5.28E-08	1.48E-05	0.00E+00	0.00E+00	1.14E-02
4016	ALL		389800	3780750	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.57E-04	0.00E+00	2.56E-04	4.80E-07	2.59E-04	1.13E-02	0.00E+00	1.03E-06	0.00E+00	5.10E-08	1.44E-05	0.00E+00	0.00E+00	1.13E-02
52	ALL		389861	3780792	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.58E-04	0.00E+00	2.58E-04	3.84E-07	2.60E-04	1.13E-02	0.00E+00	8.09E-07	0.00E+00	4.76E-08	1.35E-05	0.00E+00	0.00E+00	1.13E-02
56	ALL		389971	3780883	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.58E-04	0.00E+00	2.57E-04	3.63E-07	2.59E-04	1.13E-02	0.00E+00	7.71E-07	0.00E+00	4.55E-08	1.29E-05	0.00E+00	0.00E+00	1.13E-02
4286	ALL		389900	3780950	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.58E-04	0.00E+00	2.57E-04	3.75E-07	2.59E-04	1.13E-02	0.00E+00	7.99E-07	0.00E+00	4.60E-08	1.31E-05	0.00E+00	0.00E+00	1.13E-02
3672	ALL		389700	3780500	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.55E-04	0.00E+00	2.54E-04	5.11E-07	2.57E-04	1.13E-02	0.00E+00	1.11E-06	0.00E+00	5.17E-08	1.45E-05	0.00E+00	0.00E+00	1.13E-02
39	ALL		389812	3780548	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.53E-04	0.00E+00	2.52E-04	5.44E-07	2.54E-04	1.12E-02	0.00E+00	1.17E-06	0.00E+00	5.41E-08	1.52E-05	0.00E+00	0.00E+00	1.12E-02
4081	ALL		389750	3780800	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.52E-04	0.00E+00	2.52E-04	3.93E-07	2.54E-04	1.11E-02	0.00E+00	8.36E-07	0.00E+00	4.66E-08	1.32E-05	0.00E+00	0.00E+00	1.11E-02
4217	ALL		389950	3780900	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.53E-04	0.00E+00	2.52E-04	3.59E-07	2.54E-04	1.11E-02	0.00E+00	7.62E-07	0.00E+00	4.49E-08	1.27E-05	0.00E+00	0.00E+00	1.11E-02
59	ALL		390057	3780904	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.53E-04	0.00E+00	2.52E-04	3.34E-07	2.54E-04	1.10E-02	0.00E+00	7.17E-07	0.00E+00	4.25E-08	1.21E-05	0.00E+00	0.00E+00	1.10E-02
62	ALL		390160	3780923	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.54E-04	0.00E+00	2.53E-04	3.16E-07	2.55E-04	1.10E-02	0.00E+00	6.94E-07	0.00E+00	3.98E-08	1.14E-05	0.00E+00	0.00E+00	1.10E-02
55	ALL		389935.5	3780878.5	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.48E-04	0.00E+00	2.47E-04	3.57E-07	2.49E-04	1.08E-02	0.00E+00	7.57E-07	0.00E+00	4.46E-08	1.26E-05	0.00E+00	0.00E+00	1.08E-02
4291	ALL		390150	3780950	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.50E-04	0.00E+00	2.49E-04	3.15E-07	2.51E-04	1.08E-02	0.00E+00	6.92E-07	0.00E+00	3.96E-08	1.13E-05	0.00E+00	0.00E+00	1.08E-02
4361	ALL		390100	3781000	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.46E-04	0.00E+00	2.46E-04	3.52E-07	2.47E-04	1.07E-02	0.00E+00	7.69E-07	0.00E+00	4.13E-08	1.18E-05	0.00E+00	0.00E+00	1.07E-02
4360	ALL		390050	3781000	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.45E-04	0.00E+00	2.45E-04	3.82E-07	2.46E-04	1.07E-02	0.00E+00	8.32E-07	0.00E+00	4.31E-08	1.22E-05	0.00E+00	0.00E+00	1.07E-02
4358	ALL		389950	3781000	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.43E-04	0.00E+00	2.42E-04	4.08E-07	2.44E-04	1.06E-02	0.00E+00	8.83E-07	0.00E+00	4.49E-08	1.27E-05	0.00E+00	0.00E+00	1.06E-02
4357	ALL		389900	3781000	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.39E-04	0.00E+00	2.38E-04	4.06E-07	2.40E-04	1.05E-02	0.00E+00	8.76E-07	0.00E+00	4.48E-08	1.27E-05	0.00E+00	0.00E+00	1.05E-02
4359	ALL		390000	3781000	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.38E-04	0.00E+00	2.38E-04	3.98E-07	2.40E-04	1.04E-02	0.00E+00	8.66E-07	0.00E+00	4.36E-08	1.24E-05	0.00E+00	0.00E+00	1.04E-02
3877	ALL		389800	3780650	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.34E-04	0.00E+00	2.33E-04	4.93E-07	2.36E-04	1.04E-02	0.00E+00	1.06E-06	0.00E+00	4.92E-08	1.38E-05	0.00E+00	0.00E+00	1.04E-02
4356	ALL		389850	3781000	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.36E-04	0.00E+00	2.35E-04	3.49E-07	2.37E-04	1.03E-02	0.00E+00	7.43E-07	0.00E+00	4.25E-08	1.20E-05	0.00E+00	0.00E+00	1.03E-02
3807	ALL		389750	3780600	NonCancerChronicDerived_InhSoilDermMMilkWater	0.00E+00	2.33E-04	0.00E+00	2.32E-04	4.88E-07	2.34E-04	1.03E-02	0.00E+00	1.05E-06	0.00E+00	4.87E-08	1.37E-05	0.00E+00	0.00E+00	1.03E-02

CHRONIC 8-HOUR

*HARP - HRACalc v21081 5/4/2021 2:05:59 PM - Chronic 8Hr Risk - Input File: C:\Work\Bee\Glendale CA\Scholl Canyon 2021\HRA\Outer\SCHOLL CANYON LARGE BORDER 2021\hra\Chronic8HRAInput.hra

REC	GRP	NETID	X	Y	SCENARIO	CV	CNS	IMMUN	KIDNEY	GILV	REPRO/DEVEL	RESP	SKIN	EYE	BONE/TEETH	ENDO	BLOOD	ODOR	GENERAL	MAXHI
43	ALL		389940	3780594	NonCancer8HrChronic	0.00E+00	6.64E-05	0.00E+00	6.51E-05	0.00E+00	6.51E-05	8.12E-04	0.00E+00	4.61E-07	0.00E+00	0.00E+00	2.06E-05	0.00E+00	0.00E+00	8.12E-04
42	ALL		389918	3780577	NonCancer8HrChronic	0.00E+00	6.34E-05	0.00E+00	6.21E-05	0.00E+00	6.21E-05	8.08E-04	0.00E+00	4.61E-07	0.00E+00	0.00E+00	2.01E-05	0.00E+00	0.00E+00	8.08E-04
44	ALL		389962	3780610	NonCancer8HrChronic	0.00E+00	6.67E-05	0.00E+00	6.54E-05	0.00E+00	6.54E-05	7.95E-04	0.00E+00	4.54E-07	0.00E+00	0.00E+00	2.04E-05	0.00E+00	0.00E+00	7.95E-04
3880	ALL		389950	3780650	NonCancer8HrChronic	0.00E+00	6.68E-05	0.00E+00	6.55E-05	0.00E+00	6.55E-05	7.61E-04	0.00E+00	4.25E-07	0.00E+00	0.00E+00	1.99E-05	0.00E+00	0.00E+00	7.61E-04
3810	ALL		389900	3780600	NonCancer8HrChronic	0.00E+00	5.90E-05	0.00E+00	5.77E-05	0.00E+00	5.77E-05	7.60E-04	0.00E+00	4.35E-07	0.00E+00	0.00E+00	1.89E-05	0.00E+00	0.00E+00	7.60E-04
3879	ALL		389900	3780650	NonCancer8HrChronic	0.00E+00	6.48E-05	0.00E+00	6.35E-05	0.00E+00	6.35E-05	7.42E-04	0.00E+00	4.02E-07	0.00E+00	0.00E+00	1.93E-05	0.00E+00	0.00E+00	7.42E-04
41	ALL		389884	3780608	NonCancer8HrChronic	0.00E+00	5.59E-05	0.00E+00	5.47E-05	0.00E+00	5.47E-05	7.30E-04	0.00E+00	4.19E-07	0.00E+00	0.00E+00	1.80E-05	0.00E+00	0.00E+00	7.30E-04
45	ALL		389979	3780651	NonCancer8HrChronic	0.00E+00	6.12E-05	0.00E+00	5.99E-05	0.00E+00	5.99E-05	7.25E-04	0.00E+00	4.20E-07	0.00E+00	0.00E+00	1.86E-05	0.00E+00	0.00E+00	7.25E-04
3809	ALL		389850	3780600	NonCancer8HrChronic	0.00E+00	5.44E-05	0.00E+00	5.33E-05	0.00E+00	5.33E-05	7.11E-04	0.00E+00	4.06E-07	0.00E+00	0.00E+00	1.76E-05	0.00E+00	0.00E+00	7.11E-04
3950	ALL		389950	3780700	NonCancer8HrChronic	0.00E+00	6.09E-05	0.00E+00	5.97E-05	0.00E+00	5.97E-05	7.01E-04	0.00E+00	3.96E-07	0.00E+00	0.00E+00	1.82E-05	0.00E+00	0.00E+00	7.01E-04
40	ALL		389848	3780578	NonCancer8HrChronic	0.00E+00	5.16E-05	0.00E+00	5.05E-05	0.00E+00	5.05E-05	6.98E-04	0.00E+00	4.03E-07	0.00E+00	0.00E+00	1.70E-05	0.00E+00	0.00E+00	6.98E-04
36	ALL		389759	3780447	NonCancer8HrChronic	0.00E+00	5.32E-05	0.00E+00	5.20E-05	0.00E+00	5.20E-05	6.97E-04	0.00E+00	4.07E-07	0.00E+00	0.00E+00	1.72E-05	0.00E+00	0.00E+00	6.97E-04
3949	ALL		389900	3780700	NonCancer8HrChronic	0.00E+00	6.08E-05	0.00E+00	5.96E-05	0.00E+00	5.96E-05	6.93E-04	0.00E+00	3.77E-07	0.00E+00	0.00E+00	1.81E-05	0.00E+00	0.00E+00	6.93E-04
37	ALL		389767.5	3780483	NonCancer8HrChronic	0.00E+00	5.33E-05	0.00E+00	5.21E-05	0.00E+00	5.21E-05	6.91E-04	0.00E+00	3.99E-07	0.00E+00	0.00E+00	1.71E-05	0.00E+00	0.00E+00	6.91E-04
3606	ALL		389750	3780450	NonCancer8HrChronic	0.00E+00	5.30E-05	0.00E+00	5.18E-05	0.00E+00	5.18E-05	6.86E-04	0.00E+00	4.00E-07	0.00E+00	0.00E+00	1.70E-05	0.00E+00	0.00E+00	6.86E-04
3878	ALL		389850	3780650	NonCancer8HrChronic	0.00E+00	5.30E-05	0.00E+00	5.19E-05	0.00E+00	5.19E-05	6.75E-04	0.00E+00	3.84E-07	0.00E+00	0.00E+00	1.68E-05	0.00E+00	0.00E+00	6.75E-04
46	ALL		389980	3780686	NonCancer8HrChronic	0.00E+00	5.62E-05	0.00E+00	5.50E-05	0.00E+00	5.50E-05	6.71E-04	0.00E+00	3.92E-07	0.00E+00	0.00E+00	1.72E-05	0.00E+00	0.00E+00	6.71E-04
47	ALL		389977.5	3780719	NonCancer8HrChronic	0.00E+00	5.70E-05	0.00E+00	5.58E-05	0.00E+00	5.58E-05	6.61E-04	0.00E+00	3.83E-07	0.00E+00	0.00E+00	1.71E-05	0.00E+00	0.00E+00	6.61E-04
3740	ALL		389800	3780550	NonCancer8HrChronic	0.00E+00	4.79E-05	0.00E+00	4.69E-05	0.00E+00	4.69E-05	6.53E-04	0.00E+00	3.80E-07	0.00E+00	0.00E+00	1.59E-05	0.00E+00	0.00E+00	6.53E-04
50	ALL		389908	3780725	NonCancer8HrChronic	0.00E+00	5.30E-05	0.00E+00	5.19E-05	0.00E+00	5.19E-05	6.50E-04	0.00E+00	3.72E-07	0.00E+00	0.00E+00	1.65E-05	0.00E+00	0.00E+00	6.50E-04
3673	ALL		389750	3780500	NonCancer8HrChronic	0.00E+00	5.00E-05	0.00E+00	4.90E-05	0.00E+00	4.90E-05	6.48E-04	0.00E+00	3.77E-07	0.00E+00	0.00E+00	1.61E-05	0.00E+00	0.00E+00	6.48E-04
3948	ALL		389850	3780700	NonCancer8HrChronic	0.00E+00	5.28E-05	0.00E+00	5.17E-05	0.00E+00	5.17E-05	6.47E-04	0.00E+00	3.63E-07	0.00E+00	0.00E+00	1.64E-05	0.00E+00	0.00E+00	6.47E-04
49	ALL		389941.5	3780739	NonCancer8HrChronic	0.00E+00	5.42E-05	0.00E+00	5.31E-05	0.00E+00	5.31E-05	6.47E-04	0.00E+00	3.72E-07	0.00E+00	0.00E+00	1.66E-05	0.00E+00	0.00E+00	6.47E-04
38	ALL		389776	3780518	NonCancer8HrChronic	0.00E+00	4.68E-05	0.00E+00	4.58E-05	0.00E+00	4.58E-05	6.37E-04	0.00E+00	3.73E-07	0.00E+00	0.00E+00	1.55E-05	0.00E+00	0.00E+00	6.37E-04
51	ALL		389884.5	3780759	NonCancer8HrChronic	0.00E+00	5.61E-05	0.00E+00	5.50E-05	0.00E+00	5.50E-05	6.34E-04	0.00E+00	3.44E-07	0.00E+00	0.00E+00	1.66E-05	0.00E+00	0.00E+00	6.34E-04
48	ALL		389975	3780752	NonCancer8HrChronic	0.00E+00	5.43E-05	0.00E+00	5.32E-05	0.00E+00	5.32E-05	6.30E-04	0.00E+00	3.65E-07	0.00E+00	0.00E+00	1.63E-05	0.00E+00	0.00E+00	6.30E-04
3808	ALL		389800	3780600	NonCancer8HrChronic	0.00E+00	4.71E-05	0.00E+00	4.61E-05	0.00E+00	4.61E-05	6.30E-04	0.00E+00	3.65E-07	0.00E+00	0.00E+00	1.54E-05	0.00E+00	0.00E+00	6.30E-04
39	ALL		389812	3780548	NonCancer8HrChronic	0.00E+00	4.54E-05	0.00E+00	4.44E-05	0.00E+00	4.44E-05	6.27E-04	0.00E+00	3.64E-07	0.00E+00	0.00E+00	1.52E-05	0.00E+00	0.00E+00	6.27E-04
35	ALL		389721	3780420	NonCancer8HrChronic	0.00E+00	4.66E-05	0.00E+00	4.56E-05	0.00E+00	4.56E-05	6.24E-04	0.00E+00	3.71E-07	0.00E+00	0.00E+00	1.53E-05	0.00E+00	0.00E+00	6.24E-04
3739	ALL		389750	3780550	NonCancer8HrChronic	0.00E+00	4.81E-05	0.00E+00	4.71E-05	0.00E+00	4.71E-05	6.19E-04	0.00E+00	3.58E-07	0.00E+00	0.00E+00	1.54E-05	0.00E+00	0.00E+00	6.19E-04
4017	ALL		389850	3780750	NonCancer8HrChronic	0.00E+00	5.30E-05	0.00E+00	5.20E-05	0.00E+00	5.20E-05	6.18E-04	0.00E+00	3.38E-07	0.00E+00	0.00E+00	1.60E-05	0.00E+00	0.00E+00	6.18E-04
3605	ALL		389700	3780450	NonCancer8HrChronic	0.00E+00	4.61E-05	0.00E+00	4.52E-05	0.00E+00	4.52E-05	6.00E-04	0.00E+00	3.57E-07	0.00E+00	0.00E+00	1.48E-05	0.00E+00	0.00E+00	6.00E-04
3672	ALL		389700	3780500	NonCancer8HrChronic	0.00E+00	4.58E-05	0.00E+00	4.48E-05	0.00E+00	4.48E-05	5.83E-04	0.00E+00	3.44E-07	0.00E+00	0.00E+00	1.45E-05	0.00E+00	0.00E+00	5.83E-04
4016	ALL		389800	3780750	NonCancer8HrChronic	0.00E+00	4.61E-05	0.00E+00	4.52E-05	0.00E+00	4.52E-05	5.68E-04	0.00E+00	3.21E-07	0.00E+00	0.00E+00	1.44E-05	0.00E+00	0.00E+00	5.68E-04
3877	ALL		389800	3780650	NonCancer8HrChronic	0.00E+00	4.20E-05	0.00E+00	4.11E-05	0.00E+00	4.11E-05	5.67E-04	0.00E+00	3.31E-07	0.00E+00	0.00E+00	1.38E-05	0.00E+00	0.00E+00	5.67E-04
20	ALL		389611.5	3780048	NonCancer8HrChronic	0.00E+00	3.46E-05	0.00E+00	3.37E-05	0.00E+00	3.37E-05	5.66E-04	0.00E+00	3.20E-07	0.00E+00	0.00E+00	1.29E-05	0.00E+00	0.00E+00	5.66E-04
21	ALL		389594	3780084	NonCancer8HrChronic	0.00E+00	3.52E-05	0.00E+00	3.43E-05	0.00E+00	3.43E-05	5.62E-04	0.00E+00	3.20E-07	0.00E+00	0.00E+00	1.29E-05	0.00E+00	0.00E+00	5.62E-04
19	ALL		389629	3780012	NonCancer8HrChronic	0.00E+00	3.34E-05	0.00E+00	3.26E-05	0.00E+00	3.26E-05	5.59E-04	0.00E+00	3.14E-07	0.00E+00	0.00E+00	1.26E-05	0.00E+00	0.00E+00	5.59E-04
3807	ALL		389750	3780600	NonCancer8HrChronic	0.00E+00	4.18E-05	0.00E+00	4.09E-05	0.00E+00	4.09E-05	5.58E-04	0.00E+00	3.27E-07	0.00E+00	0.00E+00	1.37E-05	0.00E+00	0.00E+00	5.58E-04
3947	ALL		389800	3780700	NonCancer8HrChronic	0.00E+00	4.15E-05	0.00E+00	4.06E-05	0.00E+00	4.06E-05	5.51E-04	0.00E+00	3.21E-07	0.00E+00	0.00E+00	1.35E-05	0.00E+00	0.00E+00	5.51E-04
3538	ALL		389650	3780400	NonCancer8HrChronic	0.00E+00	4.13E-05	0.00E+00	4.04E-05	0.00E+00	4.04E-05	5.50E-04	0.00E+00	3.31E-07	0.00E+00	0.00E+00	1.35E-05	0.00E+00	0.00E+00	5.50E-04
3090	ALL		389600	3780050	NonCancer8HrChronic	0.00E+00	3.35E-05	0.00E+00	3.27E-05	0.00E+00	3.27E-05	5.47E-04	0.00E+00	3.10E-07	0.00E+00	0.00E+00	1.25E-05	0.00E+00	0.00E+00	5.47E-04
22	ALL		389572.3	3780113	NonCancer8HrChronic	0.00E+00	3.47E-05	0.00E+00	3.39E-05	0.00E+00	3.39E-05	5.42E-04	0.00E+00	3.11E-07	0.00E+00	0.00E+00	1.25E-05	0.00E+00	0.00E+00	5.42E-04
3738	ALL		389700	3780550	NonCancer8HrChronic	0.00E+00	4.17E-05	0.00E+00	4.08E-05	0.00E+00	4.08E-05	5.41E-04	0.00E+00	3.20E-07	0.00E+00	0.00E+00	1.34E-05	0.00E+00	0.00E+00	5.41E-04
4082	ALL		389800	3780800	NonCancer8HrChronic	0.00E+00	4.87E-05	0.00E+00	4.78E-05	0.00E+00	4.78E-05	5.38E-04	0.00E+00	2.81E-07	0.00E+00	0.00E+00	1.42E-05	0.00E+00	0.00E+00	5.38E-04
18	ALL		389646.5	3779975	NonCancer8HrChronic	0.00E+00	3.18E-05	0.00E+00	3.10E-05	0.00E+00	3.10E-05	5.38E-04	0.00E+00	3.00E-07	0.00E+00	0.00E+00	1.21E-05	0.00E+00	0.00E+00	5.38E-04
53	ALL		389880.5	3780833	NonCancer8HrChronic	0.00E+00	5.01E-05	0.00E+00	4.91E-05	0.00E+00	4.91E-05	5.32E-04	0.00E+00	2.70E-07	0.00E+00	0.00E+00	1.43E-05	0.00E+00	0.00E+00	5.32E-04
3604	ALL		389650	3780450	NonCancer8HrChronic	0.00E+00	4.01E-05	0.00E+00	3.93E-05	0.00E+00	3.93E-05	5.26E-04	0.00E+00	3.17E-07	0.00E+00	0.00E+00	1.30E-05	0.00E+00	0.00E+00	5.26E-04
23	ALL		389550.7	3780143	NonCancer8HrChronic	0.00E+00	3.42E-05	0.00E+00	3.34E-05	0.00E+00	3.34E-05	5.22E-04	0.00E+00	3.02E-07	0.00E+00	0.00E+00	1.22E-05	0.00E+00	0.00E+00	5.22E-04
4015	ALL		389750	3780750	NonCancer8HrChronic	0.00E+00	4.11E-05	0.00E+00	4.03E-05	0.00E+00	4.03E-05	5.16E-04	0.00E+00	2.97E-07	0.00E+00	0.00E+00	1.29E-05	0.00E+00	0.00E+00	5.16E-04
4287	ALL		389950	3780950	NonCancer8HrChronic	0.00E+00	4.91E-05	0.00E+00	4.82E-05	0.00E+00	4.82E-05	5.10E-04	0.00E+00	2.77E-07	0.00E+00	0.00E+00	1.39E-05	0.00E+00	0.00E+00	5.10E-04
52	ALL		389861	3780792	NonCancer8HrChronic	0.00E+00	4.63E-05	0.00E+00	4.54E-05	0.00E+00	4.54E-05	5.08E-04	0.00E+00	2.51E-07	0.00E+00	0.00E+00	1.35E-05	0.00E+00	0.00E+00	5.08E-04
3155	ALL		389550	3780100	NonCancer8HrChronic	0.00E+00	3.22E-05	0.00E+00	3.14E-05	0.00E+00	3.14E-05	5.06E-04	0.00E+00	2.92E-07	0.00E+00	0.00E+00	1.17E-05	0.00E+00	0.00E+00	5.06E-04
34	ALL		389683	3780393	NonCancer8HrChronic	0.00E+00	3.84E-05	0.00E+00	3.76E-05	0.00E+00	3.76E-05	5.04E-04	0.00E+00	2.94E-07	0.00E+00	0.00E+00	1.24E-05	0.00E+00	0.00E+00	5.04E-04
33	ALL		389645	3780367	NonCancer8HrChronic	0.00E+00	3.76E-05	0.00E+00	3.68E-05	0.00E+00	3.68E-05	5.02E-04	0.00E+00	2.96E-07	0.00E+00	0.00E+00	1.23E-05	0.00E+00	0.00E+00	5.02E-04

ACUTE

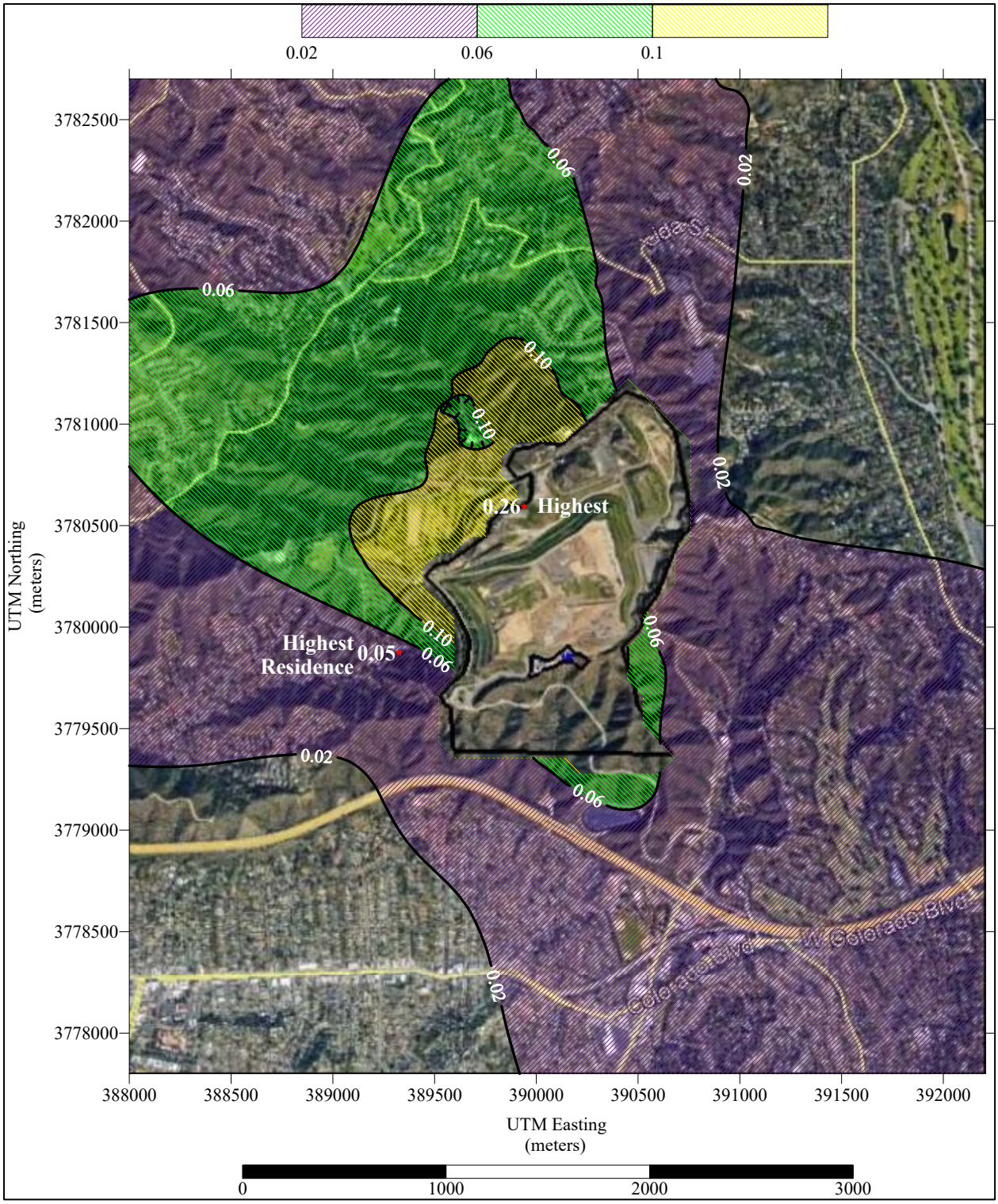
*HARP - HRACalc v21081 5/4/2021 11:40:10 AM - Acute Risk - Input File: C:\Work\Bee\Glendale CA\Scholl Canyon 2021\HRA\Outer\SCHOLL CANYON LARGE BORDER 2021\hra\AcuteHRAInput.hra

REC	GRP	NETID	X	Y	SCENARIO	CV	CNS	IMMUN	KIDNEY	GILV	REPRO/DE	RESP	SKIN	EYE	BONE/TEE	ENDO	BLOOD	ODOR	GENERAL	MAXHI
106	ALL		390419.6	3779834	NonCancer	0.00E+00	7.14E-04	8.49E-05	0.00E+00	2.40E-08	3.27E-04	2.64E-03	0.00E+00	7.58E-03	0.00E+00	0.00E+00	8.49E-05	0.00E+00	0.00E+00	7.58E-03
107	ALL		390432.2	3779792	NonCancer	0.00E+00	6.60E-04	7.92E-05	0.00E+00	2.26E-08	2.99E-04	2.39E-03	0.00E+00	7.08E-03	0.00E+00	0.00E+00	7.92E-05	0.00E+00	0.00E+00	7.08E-03
2822	ALL		390450	3779850	NonCancer	0.00E+00	6.47E-04	7.71E-05	0.00E+00	2.18E-08	2.95E-04	2.38E-03	0.00E+00	6.89E-03	0.00E+00	0.00E+00	7.71E-05	0.00E+00	0.00E+00	6.89E-03
108	ALL		390444.8	3779751	NonCancer	0.00E+00	6.21E-04	7.50E-05	0.00E+00	2.15E-08	2.79E-04	2.22E-03	0.00E+00	6.72E-03	0.00E+00	0.00E+00	7.50E-05	0.00E+00	0.00E+00	6.72E-03
2756	ALL		390450	3779800	NonCancer	0.00E+00	6.25E-04	7.49E-05	0.00E+00	2.13E-08	2.83E-04	2.27E-03	0.00E+00	6.70E-03	0.00E+00	0.00E+00	7.49E-05	0.00E+00	0.00E+00	6.70E-03
2690	ALL		390450	3779750	NonCancer	0.00E+00	6.13E-04	7.40E-05	0.00E+00	2.12E-08	2.75E-04	2.19E-03	0.00E+00	6.62E-03	0.00E+00	0.00E+00	7.40E-05	0.00E+00	0.00E+00	6.62E-03
105	ALL		390407	3779876	NonCancer	0.00E+00	6.54E-04	7.44E-05	0.00E+00	2.01E-08	3.14E-04	2.63E-03	0.00E+00	6.58E-03	0.00E+00	0.00E+00	7.44E-05	0.00E+00	0.00E+00	6.58E-03
16	ALL		389667	3779892	NonCancer	0.00E+00	5.16E-04	6.68E-05	0.00E+00	2.04E-08	2.11E-04	1.56E-03	0.00E+00	6.06E-03	0.00E+00	0.00E+00	6.68E-05	0.00E+00	0.00E+00	6.06E-03
2823	ALL		390500	3779850	NonCancer	0.00E+00	5.62E-04	6.69E-05	0.00E+00	1.89E-08	2.57E-04	2.07E-03	0.00E+00	5.98E-03	0.00E+00	0.00E+00	6.69E-05	0.00E+00	0.00E+00	5.98E-03
109	ALL		390457.4	3779709	NonCancer	0.00E+00	5.56E-04	6.68E-05	0.00E+00	1.91E-08	2.51E-04	2.01E-03	0.00E+00	5.98E-03	0.00E+00	0.00E+00	6.68E-05	0.00E+00	0.00E+00	5.98E-03
17	ALL		389664	3779939	NonCancer	0.00E+00	5.14E-04	6.54E-05	0.00E+00	1.97E-08	2.15E-04	1.62E-03	0.00E+00	5.92E-03	0.00E+00	0.00E+00	6.54E-05	0.00E+00	0.00E+00	5.92E-03
2821	ALL		389650	3779850	NonCancer	0.00E+00	5.07E-04	6.52E-05	0.00E+00	1.98E-08	2.09E-04	1.56E-03	0.00E+00	5.92E-03	0.00E+00	0.00E+00	6.52E-05	0.00E+00	0.00E+00	5.92E-03
2691	ALL		390500	3779750	NonCancer	0.00E+00	5.41E-04	6.51E-05	0.00E+00	1.86E-08	2.44E-04	1.96E-03	0.00E+00	5.83E-03	0.00E+00	0.00E+00	6.51E-05	0.00E+00	0.00E+00	5.83E-03
2757	ALL		390500	3779800	NonCancer	0.00E+00	5.46E-04	6.52E-05	0.00E+00	1.85E-08	2.49E-04	2.00E-03	0.00E+00	5.83E-03	0.00E+00	0.00E+00	6.52E-05	0.00E+00	0.00E+00	5.83E-03
2889	ALL		389650	3779900	NonCancer	0.00E+00	4.91E-04	6.33E-05	0.00E+00	1.92E-08	2.02E-04	1.50E-03	0.00E+00	5.74E-03	0.00E+00	0.00E+00	6.33E-05	0.00E+00	0.00E+00	5.74E-03
110	ALL		390470	3779667	NonCancer	0.00E+00	5.24E-04	6.38E-05	0.00E+00	1.85E-08	2.32E-04	1.84E-03	0.00E+00	5.73E-03	0.00E+00	0.00E+00	6.38E-05	0.00E+00	0.00E+00	5.73E-03
2957	ALL		389650	3779950	NonCancer	0.00E+00	4.96E-04	6.32E-05	0.00E+00	1.90E-08	2.08E-04	1.57E-03	0.00E+00	5.72E-03	0.00E+00	0.00E+00	6.32E-05	0.00E+00	0.00E+00	5.72E-03
14	ALL		389654	3779804	NonCancer	0.00E+00	4.79E-04	6.21E-05	0.00E+00	1.90E-08	1.95E-04	1.44E-03	0.00E+00	5.64E-03	0.00E+00	0.00E+00	6.21E-05	0.00E+00	0.00E+00	5.64E-03
2890	ALL		390450	3779900	NonCancer	0.00E+00	5.45E-04	6.34E-05	0.00E+00	1.75E-08	2.56E-04	2.11E-03	0.00E+00	5.63E-03	0.00E+00	0.00E+00	6.34E-05	0.00E+00	0.00E+00	5.63E-03
18	ALL		389646.5	3779975	NonCancer	0.00E+00	4.87E-04	6.22E-05	0.00E+00	1.87E-08	2.03E-04	1.53E-03	0.00E+00	5.63E-03	0.00E+00	0.00E+00	6.22E-05	0.00E+00	0.00E+00	5.63E-03
131	ALL		390067.2	3779358	NonCancer	0.00E+00	4.96E-04	6.18E-05	0.00E+00	1.82E-08	2.14E-04	1.65E-03	0.00E+00	5.57E-03	0.00E+00	0.00E+00	6.18E-05	0.00E+00	0.00E+00	5.57E-03
130	ALL		390115.5	3779357	NonCancer	0.00E+00	4.94E-04	6.14E-05	0.00E+00	1.81E-08	2.14E-04	1.66E-03	0.00E+00	5.53E-03	0.00E+00	0.00E+00	6.14E-05	0.00E+00	0.00E+00	5.53E-03
111	ALL		390471.5	3779634	NonCancer	0.00E+00	5.04E-04	6.14E-05	0.00E+00	1.78E-08	2.24E-04	1.77E-03	0.00E+00	5.51E-03	0.00E+00	0.00E+00	6.14E-05	0.00E+00	0.00E+00	5.51E-03
132	ALL		390018.9	3779360	NonCancer	0.00E+00	4.87E-04	6.10E-05	0.00E+00	1.81E-08	2.09E-04	1.61E-03	0.00E+00	5.50E-03	0.00E+00	0.00E+00	6.10E-05	0.00E+00	0.00E+00	5.50E-03
2755	ALL		389650	3779800	NonCancer	0.00E+00	4.67E-04	6.05E-05	0.00E+00	1.85E-08	1.91E-04	1.41E-03	0.00E+00	5.49E-03	0.00E+00	0.00E+00	6.05E-05	0.00E+00	0.00E+00	5.49E-03
133	ALL		389970.6	3779361	NonCancer	0.00E+00	4.81E-04	6.03E-05	0.00E+00	1.79E-08	2.06E-04	1.58E-03	0.00E+00	5.44E-03	0.00E+00	0.00E+00	6.03E-05	0.00E+00	0.00E+00	5.44E-03
2182	ALL		390050	3779350	NonCancer	0.00E+00	4.83E-04	6.03E-05	0.00E+00	1.78E-08	2.08E-04	1.60E-03	0.00E+00	5.44E-03	0.00E+00	0.00E+00	6.03E-05	0.00E+00	0.00E+00	5.44E-03
2183	ALL		390100	3779350	NonCancer	0.00E+00	4.85E-04	6.03E-05	0.00E+00	1.77E-08	2.10E-04	1.63E-03	0.00E+00	5.43E-03	0.00E+00	0.00E+00	6.03E-05	0.00E+00	0.00E+00	5.43E-03
2891	ALL		390500	3779900	NonCancer	0.00E+00	4.96E-04	6.03E-05	0.00E+00	1.74E-08	2.21E-04	1.75E-03	0.00E+00	5.41E-03	0.00E+00	0.00E+00	6.03E-05	0.00E+00	0.00E+00	5.41E-03
2625	ALL		390500	3779700	NonCancer	0.00E+00	5.07E-04	6.05E-05	0.00E+00	1.72E-08	2.31E-04	1.86E-03	0.00E+00	5.41E-03	0.00E+00	0.00E+00	6.05E-05	0.00E+00	0.00E+00	5.41E-03
129	ALL		390163.8	3779356	NonCancer	0.00E+00	4.83E-04	5.98E-05	0.00E+00	1.75E-08	2.10E-04	1.63E-03	0.00E+00	5.38E-03	0.00E+00	0.00E+00	5.98E-05	0.00E+00	0.00E+00	5.38E-03
112	ALL		390473	3779600	NonCancer	0.00E+00	4.97E-04	6.01E-05	0.00E+00	1.72E-08	2.23E-04	1.77E-03	0.00E+00	5.38E-03	0.00E+00	0.00E+00	6.01E-05	0.00E+00	0.00E+00	5.38E-03
2181	ALL		390000	3779350	NonCancer	0.00E+00	4.75E-04	5.94E-05	0.00E+00	1.76E-08	2.04E-04	1.57E-03	0.00E+00	5.36E-03	0.00E+00	0.00E+00	5.94E-05	0.00E+00	0.00E+00	5.36E-03
104	ALL		390438.3	3779909	NonCancer	0.00E+00	5.42E-04	6.07E-05	0.00E+00	1.61E-08	2.65E-04	2.24E-03	0.00E+00	5.36E-03	0.00E+00	0.00E+00	6.07E-05	0.00E+00	0.00E+00	5.36E-03
2184	ALL		390150	3779350	NonCancer	0.00E+00	4.77E-04	5.91E-05	0.00E+00	1.74E-08	2.08E-04	1.61E-03	0.00E+00	5.32E-03	0.00E+00	0.00E+00	5.91E-05	0.00E+00	0.00E+00	5.32E-03
2561	ALL		390500	3779650	NonCancer	0.00E+00	4.91E-04	5.93E-05	0.00E+00	1.70E-08	2.20E-04	1.75E-03	0.00E+00	5.32E-03	0.00E+00	0.00E+00	5.93E-05	0.00E+00	0.00E+00	5.32E-03
2820	ALL		389600	3779850	NonCancer	0.00E+00	4.57E-04	5.84E-05	0.00E+00	1.76E-08	1.91E-04	1.43E-03	0.00E+00	5.29E-03	0.00E+00	0.00E+00	5.84E-05	0.00E+00	0.00E+00	5.29E-03
19	ALL		389629	3780012	NonCancer	0.00E+00	4.52E-04	5.78E-05	0.00E+00	1.74E-08	1.88E-04	1.41E-03	0.00E+00	5.23E-03	0.00E+00	0.00E+00	5.78E-05	0.00E+00	0.00E+00	5.23E-03
128	ALL		390212.1	3779354	NonCancer	0.00E+00	4.73E-04	5.82E-05	0.00E+00	1.70E-08	2.07E-04	1.62E-03	0.00E+00	5.23E-03	0.00E+00	0.00E+00	5.82E-05	0.00E+00	0.00E+00	5.23E-03
2824	ALL		390550	3779850	NonCancer	0.00E+00	4.89E-04	5.83E-05	0.00E+00	1.65E-08	2.23E-04	1.80E-03	0.00E+00	5.21E-03	0.00E+00	0.00E+00	5.83E-05	0.00E+00	0.00E+00	5.21E-03
2185	ALL		390200	3779350	NonCancer	0.00E+00	4.70E-04	5.79E-05	0.00E+00	1.69E-08	2.06E-04	1.61E-03	0.00E+00	5.21E-03	0.00E+00	0.00E+00	5.79E-05	0.00E+00	0.00E+00	5.21E-03
2180	ALL		389950	3779350	NonCancer	0.00E+00	4.59E-04	5.76E-05	0.00E+00	1.71E-08	1.97E-04	1.51E-03	0.00E+00	5.19E-03	0.00E+00	0.00E+00	5.76E-05	0.00E+00	0.00E+00	5.19E-03
2758	ALL		390550	3779800	NonCancer	0.00E+00	4.84E-04	5.78E-05	0.00E+00	1.64E-08	2.21E-04	1.78E-03	0.00E+00	5.16E-03	0.00E+00	0.00E+00	5.78E-05	0.00E+00	0.00E+00	5.16E-03
134	ALL		389922.2	3779362	NonCancer	0.00E+00	4.55E-04	5.70E-05	0.00E+00	1.69E-08	1.94E-04	1.49E-03	0.00E+00	5.15E-03	0.00E+00	0.00E+00	5.70E-05	0.00E+00	0.00E+00	5.15E-03
135	ALL		389873.9	3779363	NonCancer	0.00E+00	4.53E-04	5.69E-05	0.00E+00	1.69E-08	1.93E-04	1.47E-03	0.00E+00	5.14E-03	0.00E+00	0.00E+00	5.69E-05	0.00E+00	0.00E+00	5.14E-03
2692	ALL		390550	3779750	NonCancer	0.00E+00	4.74E-04	5.70E-05	0.00E+00	1.63E-08	2.14E-04	1.71E-03	0.00E+00	5.10E-03	0.00E+00	0.00E+00	5.70E-05	0.00E+00	0.00E+00	5.10E-03
2179	ALL		389900	3779350	NonCancer	0.00E+00	4.47E-04	5.61E-05	0.00E+00	1.67E-08	1.91E-04	1.46E-03	0.00E+00	5.07E-03	0.00E+00	0.00E+00	5.61E-05	0.00E+00	0.00E+00	5.07E-03
2892	ALL		390550	3779900	NonCancer	0.00E+00	4.68E-04	5.63E-05	0.00E+00	1.61E-08	2.11E-04	1.69E-03	0.00E+00	5.04E-03	0.00E+00	0.00E+00	5.63E-05	0.00E+00	0.00E+00	5.04E-03
2498	ALL		390500	3779600	NonCancer	0.00E+00	4.66E-04	5.61E-05	0.00E+00	1.61E-08	2.10E-04	1.67E-03	0.00E+00	5.02E-03	0.00E+00	0.00E+00	5.61E-05	0.00E+00	0.00E+00	5.02E-03
2186	ALL		390250	3779350	NonCancer	0.00E+00	4.54E-04	5.57E-05	0.00E+00	1.62E-08	2.00E-04	1.56E-03	0.00E+00	5.01E-03	0.00E+00	0.00E+00	5.57E-05	0.00E+00	0.00E+00	5.01E-03
127	ALL		390260.5	3779353	NonCancer	0.00E+00	4.53E-04	5.55E-05	0.00E+00	1.62E-08	1.99E-04	1.56E-03	0.00E+00	4.99E-03	0.00E+00	0.00E+00	5.55E-05	0.00E+00	0.00E+00	4.99E-03
2626	ALL		390550	3779700	NonCancer	0.00E+00	4.61E-04	5.50E-05	0.00E+00	1.56E-08	2.10E-04	1.69E-03	0.00E+00	4.92E-03	0.00E+00	0.00E+00	5.50E-05	0.00E+00	0.00E+00	4.92E-03
3024	ALL		389600	3780000	NonCancer	0.00E+00	4.26E-04	5.43E-05	0.00E+00	1.63E-08	1.78E-04	1.34E-03	0.00E+00	4.91E-03	0.00E+00	0.00E+00	5.43E-05	0.00E+00	0.00E+00	4.91E-03

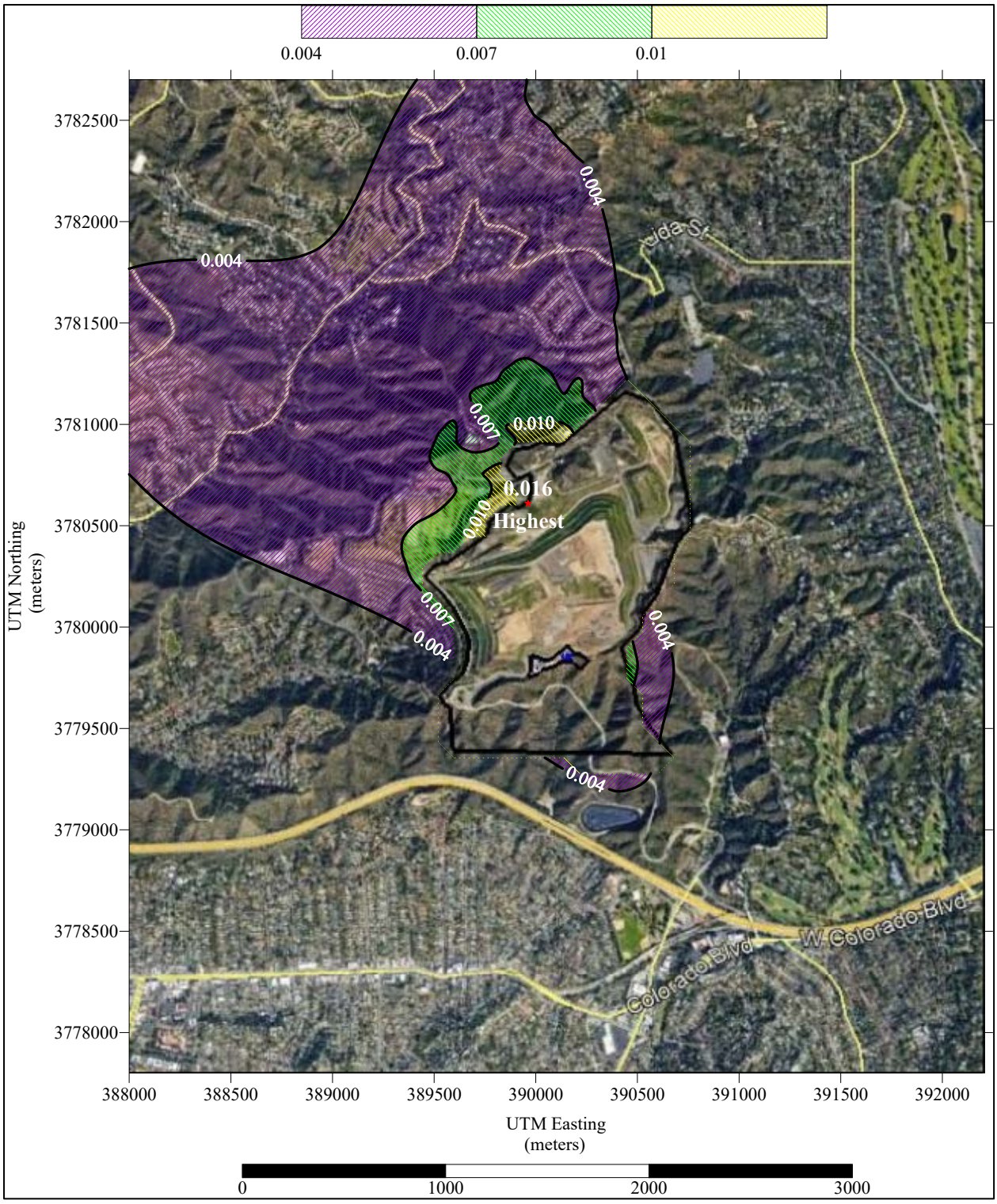
SITE MAPS SHOWING THE LOCATIONS OF MODELING RESULTS

CANCER RISK OUTPUT

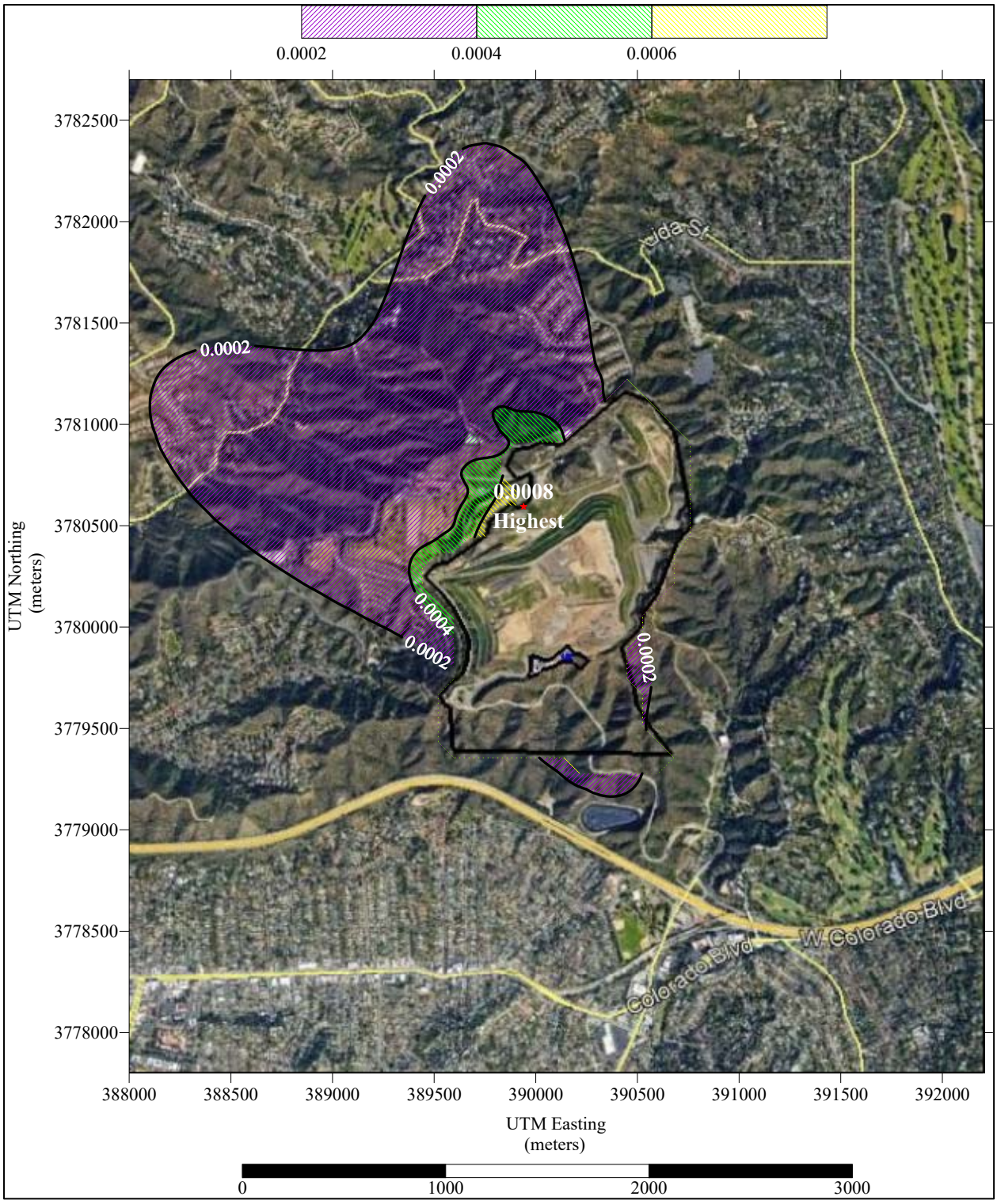
(UNIT OF MEASUREMENT: IN ONE MILLION)



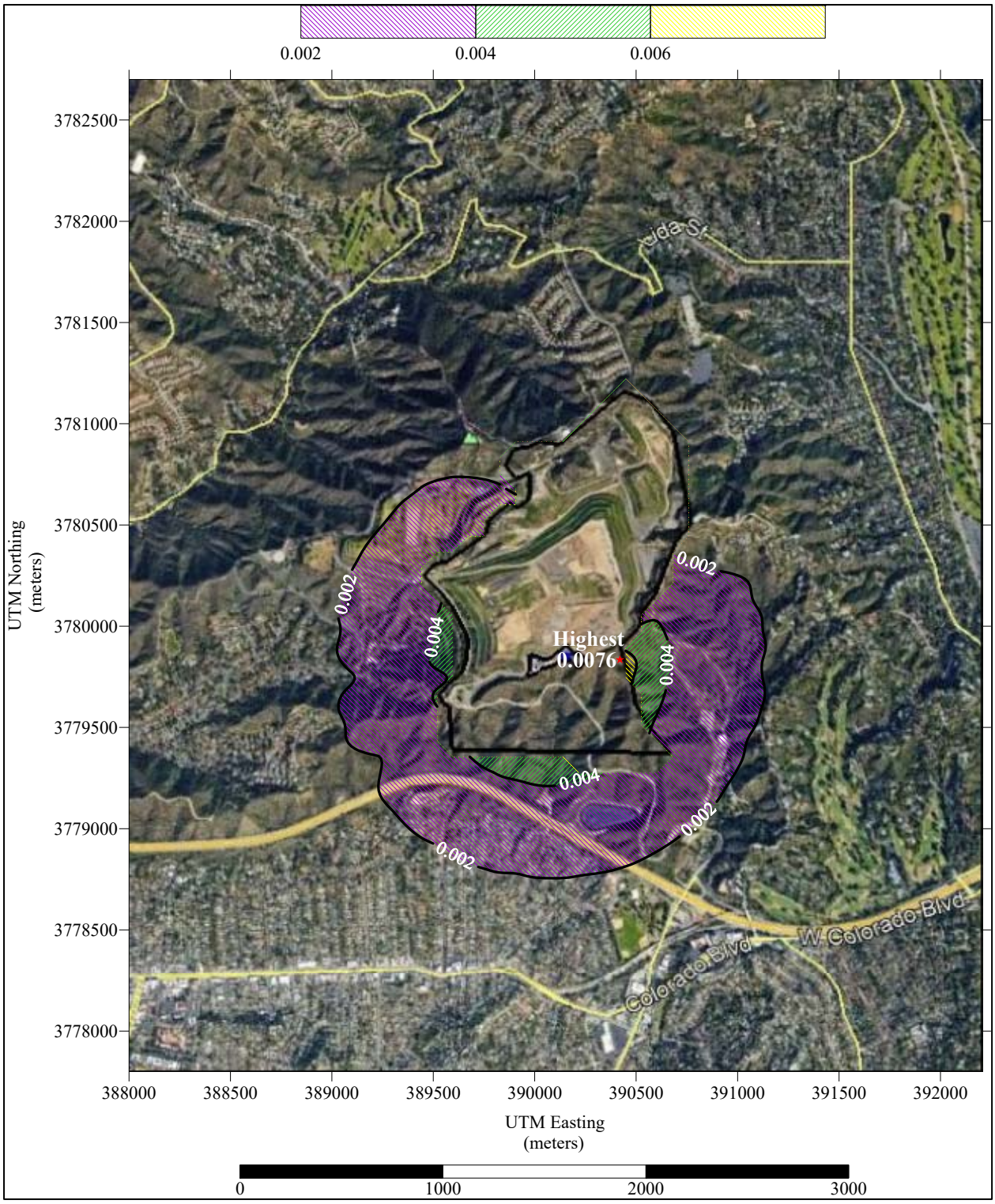
CHRONIC OUTPUT



CHRONIC 8-HOUR OUTPUT



ACUTE OUTPUT



POST LANDFILL CLOSURE

HRA RESULTS
(THE HIGHEST VALUES)

CANCER

*HARP - HRACalc v21081 5/4/2021 11:52:29 AM - Cancer Risk - Input File: C:\Work\Bee\Glendale CA\Scholl Canyon 2021\HRA\Inner\SCHOLL CANYON INNER BORDER\hra\CancerInnerHRAInput.hra

REC	GRP	NETID	X	Y	RISK_SUM	SCENARIO	INH_RISK	SOIL_RISK	DERMAL_R	MMILK_RIS	WATER_RI	FISH_RISK	CROP_RISK	BEEF_RISK	DAIRY_RISI	PIG_RISK	CHICKEN_F	EGG_RISK
725	ALL		390041	3779818	7.83E-06	30YrCancer	7.83E-06	2.82E-11	1.60E-12	3.37E-11	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
724	ALL		390023	3779825	2.66E-06	30YrCancer	2.66E-06	9.39E-12	5.32E-13	1.12E-11	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
168	ALL		390050	3779850	2.52E-06	30YrCancer	2.52E-06	8.77E-12	4.97E-13	1.05E-11	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
726	ALL		390048	3779817	2.21E-06	30YrCancer	2.21E-06	7.76E-12	4.39E-13	9.27E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
181	ALL		390050	3779900	2.00E-06	30YrCancer	2.00E-06	6.70E-12	3.79E-13	8.01E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
180	ALL		390000	3779900	1.77E-06	30YrCancer	1.77E-06	6.01E-12	3.40E-13	7.18E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
167	ALL		390000	3779850	1.72E-06	30YrCancer	1.72E-06	5.95E-12	3.37E-13	7.12E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
723	ALL		390005	3779831	1.61E-06	30YrCancer	1.61E-06	5.60E-12	3.17E-13	6.70E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
196	ALL		390050	3779950	1.48E-06	30YrCancer	1.48E-06	4.78E-12	2.70E-13	5.71E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
195	ALL		390000	3779950	1.44E-06	30YrCancer	1.44E-06	4.76E-12	2.70E-13	5.70E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
722	ALL		389987	3779838	1.25E-06	30YrCancer	1.25E-06	4.30E-12	2.43E-13	5.14E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
760	ALL		390045	3779776	1.23E-06	30YrCancer	1.23E-06	4.23E-12	2.39E-13	5.05E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
759	ALL		390059	3779780	1.22E-06	30YrCancer	1.22E-06	4.20E-12	2.38E-13	5.02E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
213	ALL		390050	3780000	1.14E-06	30YrCancer	1.14E-06	3.51E-12	1.99E-13	4.19E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
212	ALL		390000	3780000	1.13E-06	30YrCancer	1.13E-06	3.64E-12	2.06E-13	4.36E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
721	ALL		389969	3779844	1.01E-06	30YrCancer	1.01E-06	3.44E-12	1.95E-13	4.11E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
727	ALL		390057	3779818	9.95E-07	30YrCancer	9.95E-07	3.34E-12	1.89E-13	3.99E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
179	ALL		389950	3779900	9.82E-07	30YrCancer	9.82E-07	3.28E-12	1.86E-13	3.92E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
194	ALL		389950	3779950	9.36E-07	30YrCancer	9.36E-07	3.06E-12	1.73E-13	3.66E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
230	ALL		390000	3780050	9.06E-07	30YrCancer	9.06E-07	2.81E-12	1.59E-13	3.35E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
231	ALL		390050	3780050	9.03E-07	30YrCancer	9.03E-07	2.68E-12	1.52E-13	3.20E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
758	ALL		390075	3779786	8.67E-07	30YrCancer	8.67E-07	2.89E-12	1.64E-13	3.45E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
761	ALL		390024	3779772	8.57E-07	30YrCancer	8.57E-07	2.90E-12	1.64E-13	3.47E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
197	ALL		390100	3779950	8.45E-07	30YrCancer	8.45E-07	2.28E-12	1.29E-13	2.72E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
211	ALL		389950	3780000	8.36E-07	30YrCancer	8.36E-07	2.68E-12	1.52E-13	3.20E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
166	ALL		389950	3779850	8.25E-07	30YrCancer	8.25E-07	2.78E-12	1.58E-13	3.33E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
142	ALL		390050	3779750	8.20E-07	30YrCancer	8.20E-07	2.76E-12	1.56E-13	3.29E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
728	ALL		390065	3779824	8.15E-07	30YrCancer	8.15E-07	2.67E-12	1.51E-13	3.19E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
720	ALL		389966.5	3779830	8.11E-07	30YrCancer	8.11E-07	2.74E-12	1.55E-13	3.28E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
214	ALL		390100	3780000	8.01E-07	30YrCancer	8.01E-07	2.09E-12	1.19E-13	2.50E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
250	ALL		390050	3780100	7.53E-07	30YrCancer	7.53E-07	2.12E-12	1.20E-13	2.54E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
762	ALL		390016	3779767	7.46E-07	30YrCancer	7.46E-07	2.51E-12	1.42E-13	3.00E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
182	ALL		390100	3779900	7.44E-07	30YrCancer	7.44E-07	2.08E-12	1.18E-13	2.48E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
249	ALL		390000	3780100	7.41E-07	30YrCancer	7.41E-07	2.23E-12	1.26E-13	2.67E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
757	ALL		390089	3779793	7.22E-07	30YrCancer	7.22E-07	2.35E-12	1.33E-13	2.82E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
229	ALL		389950	3780050	7.21E-07	30YrCancer	7.21E-07	2.26E-12	1.28E-13	2.70E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
232	ALL		390100	3780050	7.04E-07	30YrCancer	7.04E-07	1.82E-12	1.03E-13	2.17E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
729	ALL		390081.5	3779837	6.86E-07	30YrCancer	6.86E-07	2.16E-12	1.22E-13	2.58E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
763	ALL		390009	3779758	6.46E-07	30YrCancer	6.46E-07	2.16E-12	1.22E-13	2.58E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
143	ALL		390100	3779750	6.42E-07	30YrCancer	6.42E-07	2.07E-12	1.17E-13	2.47E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
193	ALL		389900	3779950	6.32E-07	30YrCancer	6.32E-07	2.04E-12	1.16E-13	2.44E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
248	ALL		389950	3780100	6.26E-07	30YrCancer	6.26E-07	1.94E-12	1.10E-13	2.32E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
268	ALL		390000	3780150	6.24E-07	30YrCancer	6.24E-07	1.83E-12	1.04E-13	2.19E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
269	ALL		390050	3780150	6.22E-07	30YrCancer	6.22E-07	1.72E-12	9.76E-14	2.06E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
719	ALL		389964	3779816	6.22E-07	30YrCancer	6.22E-07	2.07E-12	1.17E-13	2.47E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
756	ALL		390107	3779805	6.20E-07	30YrCancer	6.20E-07	2.01E-12	1.14E-13	2.40E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
178	ALL		389900	3779900	6.15E-07	30YrCancer	6.15E-07	2.02E-12	1.15E-13	2.42E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

CHRONIC

*HARP - HRACalc v21081 5/4/2021 11:58:06 AM - Chronic Risk - Input File: C:\Work\Bee\Glendale CA\Scholl Canyon 2021\HRA\Inner\SCHOLL CANYON INNER BORDER\hra\ChronicInnerHRAInput.hra

REC	GRP	NETID	X	Y	SCENARIO	CV	CNS	IMMUN	KIDNEY	GILV	REPRO/DE	RESP	SKIN	EYE	BONE/TEE	ENDO	BLOOD	ODOR	GENERAL	MAXHI
725	ALL		390041	3779818	NonCancer	0.00E+00	3.51E-03	0.00E+00	3.48E-03	1.37E-05	3.58E-03	1.75E-01	0.00E+00	2.24E-05	0.00E+00	1.88E-06	5.10E-04	0.00E+00	0.00E+00	1.75E-01
168	ALL		390050	3779850	NonCancer	0.00E+00	1.47E-03	0.00E+00	1.46E-03	5.32E-06	1.49E-03	7.03E-02	0.00E+00	9.77E-06	0.00E+00	6.18E-07	1.68E-04	0.00E+00	0.00E+00	7.03E-02
181	ALL		390050	3779900	NonCancer	0.00E+00	1.47E-03	0.00E+00	1.46E-03	5.21E-06	1.49E-03	6.83E-02	0.00E+00	1.06E-05	0.00E+00	5.01E-07	1.38E-04	0.00E+00	0.00E+00	6.83E-02
724	ALL		390023	3779825	NonCancer	0.00E+00	1.40E-03	0.00E+00	1.39E-03	5.07E-06	1.42E-03	6.79E-02	0.00E+00	8.78E-06	0.00E+00	6.46E-07	1.76E-04	0.00E+00	0.00E+00	6.79E-02
196	ALL		390050	3779950	NonCancer	0.00E+00	1.35E-03	0.00E+00	1.34E-03	3.97E-06	1.36E-03	6.12E-02	0.00E+00	8.23E-06	0.00E+00	3.82E-07	1.06E-04	0.00E+00	0.00E+00	6.12E-02
726	ALL		390048	3779817	NonCancer	0.00E+00	1.23E-03	0.00E+00	1.22E-03	3.88E-06	1.25E-03	5.92E-02	0.00E+00	6.45E-06	0.00E+00	5.40E-07	1.47E-04	0.00E+00	0.00E+00	5.92E-02
214	ALL		390100	3780000	NonCancer	0.00E+00	1.32E-03	0.00E+00	1.32E-03	2.07E-06	1.33E-03	5.76E-02	0.00E+00	4.56E-06	0.00E+00	2.29E-07	6.51E-05	0.00E+00	0.00E+00	5.76E-02
197	ALL		390100	3779950	NonCancer	0.00E+00	1.31E-03	0.00E+00	1.31E-03	2.23E-06	1.32E-03	5.73E-02	0.00E+00	4.87E-06	0.00E+00	2.38E-07	6.76E-05	0.00E+00	0.00E+00	5.73E-02
180	ALL		390000	3779900	NonCancer	0.00E+00	1.21E-03	0.00E+00	1.20E-03	4.51E-06	1.22E-03	5.65E-02	0.00E+00	9.02E-06	0.00E+00	4.40E-07	1.20E-04	0.00E+00	0.00E+00	5.65E-02
213	ALL		390050	3780000	NonCancer	0.00E+00	1.23E-03	0.00E+00	1.22E-03	3.01E-06	1.24E-03	5.50E-02	0.00E+00	6.32E-06	0.00E+00	3.01E-07	8.37E-05	0.00E+00	0.00E+00	5.50E-02
195	ALL		390000	3779950	NonCancer	0.00E+00	1.15E-03	0.00E+00	1.14E-03	3.79E-06	1.16E-03	5.28E-02	0.00E+00	7.74E-06	0.00E+00	3.65E-07	1.00E-04	0.00E+00	0.00E+00	5.28E-02
215	ALL		390150	3780000	NonCancer	0.00E+00	1.21E-03	0.00E+00	1.21E-03	1.23E-06	1.22E-03	5.20E-02	0.00E+00	2.87E-06	0.00E+00	1.59E-07	4.61E-05	0.00E+00	0.00E+00	5.20E-02
232	ALL		390100	3780050	NonCancer	0.00E+00	1.19E-03	0.00E+00	1.19E-03	1.80E-06	1.20E-03	5.20E-02	0.00E+00	3.96E-06	0.00E+00	2.03E-07	5.77E-05	0.00E+00	0.00E+00	5.20E-02
198	ALL		390150	3779950	NonCancer	0.00E+00	1.19E-03	0.00E+00	1.19E-03	1.19E-06	1.19E-03	5.11E-02	0.00E+00	2.79E-06	0.00E+00	1.54E-07	4.49E-05	0.00E+00	0.00E+00	5.11E-02
167	ALL		390000	3779850	NonCancer	0.00E+00	1.04E-03	0.00E+00	1.04E-03	4.03E-06	1.06E-03	4.96E-02	0.00E+00	7.75E-06	0.00E+00	4.23E-07	1.15E-04	0.00E+00	0.00E+00	4.96E-02
231	ALL		390050	3780050	NonCancer	0.00E+00	1.10E-03	0.00E+00	1.10E-03	2.36E-06	1.11E-03	4.88E-02	0.00E+00	4.99E-06	0.00E+00	2.43E-07	6.81E-05	0.00E+00	0.00E+00	4.88E-02
251	ALL		390100	3780100	NonCancer	0.00E+00	1.12E-03	0.00E+00	1.12E-03	1.53E-06	1.13E-03	4.88E-02	0.00E+00	3.40E-06	0.00E+00	1.79E-07	5.13E-05	0.00E+00	0.00E+00	4.88E-02
233	ALL		390150	3780050	NonCancer	0.00E+00	1.13E-03	0.00E+00	1.13E-03	1.16E-06	1.14E-03	4.87E-02	0.00E+00	2.68E-06	0.00E+00	1.49E-07	4.34E-05	0.00E+00	0.00E+00	4.87E-02
212	ALL		390000	3780000	NonCancer	0.00E+00	1.03E-03	0.00E+00	1.03E-03	2.98E-06	1.04E-03	4.69E-02	0.00E+00	6.16E-06	0.00E+00	2.92E-07	8.08E-05	0.00E+00	0.00E+00	4.69E-02
182	ALL		390100	3779900	NonCancer	0.00E+00	1.07E-03	0.00E+00	1.06E-03	1.97E-06	1.07E-03	4.69E-02	0.00E+00	4.28E-06	0.00E+00	2.07E-07	5.83E-05	0.00E+00	0.00E+00	4.69E-02
747	ALL		390227.3	3779791	NonCancer	0.00E+00	1.09E-03	0.00E+00	1.08E-03	1.13E-06	1.09E-03	4.67E-02	0.00E+00	2.62E-06	0.00E+00	1.45E-07	4.20E-05	0.00E+00	0.00E+00	4.67E-02
250	ALL		390050	3780100	NonCancer	0.00E+00	1.05E-03	0.00E+00	1.05E-03	1.94E-06	1.06E-03	4.63E-02	0.00E+00	4.15E-06	0.00E+00	2.08E-07	5.86E-05	0.00E+00	0.00E+00	4.63E-02
723	ALL		390005	3779831	NonCancer	0.00E+00	9.63E-04	0.00E+00	9.57E-04	3.56E-06	9.77E-04	4.59E-02	0.00E+00	6.69E-06	0.00E+00	3.96E-07	1.08E-04	0.00E+00	0.00E+00	4.59E-02
252	ALL		390150	3780100	NonCancer	0.00E+00	1.06E-03	0.00E+00	1.06E-03	1.07E-06	1.07E-03	4.57E-02	0.00E+00	2.48E-06	0.00E+00	1.40E-07	4.06E-05	0.00E+00	0.00E+00	4.57E-02
746	ALL		390239	3779803	NonCancer	0.00E+00	1.05E-03	0.00E+00	1.05E-03	1.06E-06	1.05E-03	4.50E-02	0.00E+00	2.46E-06	0.00E+00	1.37E-07	3.98E-05	0.00E+00	0.00E+00	4.50E-02
230	ALL		390000	3780050	NonCancer	0.00E+00	9.60E-04	0.00E+00	9.56E-04	2.36E-06	9.67E-04	4.31E-02	0.00E+00	4.92E-06	0.00E+00	2.39E-07	6.64E-05	0.00E+00	0.00E+00	4.31E-02
270	ALL		390100	3780150	NonCancer	0.00E+00	9.61E-04	0.00E+00	9.58E-04	1.32E-06	9.65E-04	4.17E-02	0.00E+00	2.93E-06	0.00E+00	1.54E-07	4.40E-05	0.00E+00	0.00E+00	4.17E-02
269	ALL		390050	3780150	NonCancer	0.00E+00	9.05E-04	0.00E+00	9.02E-04	1.59E-06	9.10E-04	3.98E-02	0.00E+00	3.43E-06	0.00E+00	1.73E-07	4.89E-05	0.00E+00	0.00E+00	3.98E-02
216	ALL		390200	3780000	NonCancer	0.00E+00	9.20E-04	0.00E+00	9.18E-04	7.44E-07	9.22E-04	3.93E-02	0.00E+00	1.79E-06	0.00E+00	1.07E-07	3.14E-05	0.00E+00	0.00E+00	3.93E-02
249	ALL		390000	3780100	NonCancer	0.00E+00	8.60E-04	0.00E+00	8.56E-04	1.92E-06	8.66E-04	3.83E-02	0.00E+00	4.03E-06	0.00E+00	1.98E-07	5.53E-05	0.00E+00	0.00E+00	3.83E-02
271	ALL		390150	3780150	NonCancer	0.00E+00	8.87E-04	0.00E+00	8.85E-04	9.60E-07	8.89E-04	3.81E-02	0.00E+00	2.20E-06	0.00E+00	1.22E-07	3.52E-05	0.00E+00	0.00E+00	3.81E-02
722	ALL		389987	3779838	NonCancer	0.00E+00	8.02E-04	0.00E+00	7.97E-04	3.01E-06	8.12E-04	3.78E-02	0.00E+00	5.87E-06	0.00E+00	3.09E-07	8.46E-05	0.00E+00	0.00E+00	3.78E-02
759	ALL		390059	3779780	NonCancer	0.00E+00	8.00E-04	0.00E+00	7.96E-04	2.51E-06	8.11E-04	3.77E-02	0.00E+00	4.58E-06	0.00E+00	3.04E-07	8.31E-05	0.00E+00	0.00E+00	3.77E-02
234	ALL		390200	3780050	NonCancer	0.00E+00	8.80E-04	0.00E+00	8.78E-04	7.26E-07	8.82E-04	3.76E-02	0.00E+00	1.74E-06	0.00E+00	1.03E-07	3.03E-05	0.00E+00	0.00E+00	3.76E-02
183	ALL		390150	3779900	NonCancer	0.00E+00	8.69E-04	0.00E+00	8.67E-04	1.05E-06	8.72E-04	3.75E-02	0.00E+00	2.39E-06	0.00E+00	1.26E-07	3.64E-05	0.00E+00	0.00E+00	3.75E-02
760	ALL		390045	3779776	NonCancer	0.00E+00	7.84E-04	0.00E+00	7.79E-04	2.52E-06	7.95E-04	3.70E-02	0.00E+00	4.60E-06	0.00E+00	3.04E-07	8.31E-05	0.00E+00	0.00E+00	3.70E-02
194	ALL		389950	3779950	NonCancer	0.00E+00	7.95E-04	0.00E+00	7.91E-04	2.47E-06	8.03E-04	3.64E-02	0.00E+00	5.06E-06	0.00E+00	2.39E-07	6.60E-05	0.00E+00	0.00E+00	3.64E-02
291	ALL		390100	3780200	NonCancer	0.00E+00	8.13E-04	0.00E+00	8.11E-04	1.14E-06	8.16E-04	3.53E-02	0.00E+00	2.52E-06	0.00E+00	1.32E-07	3.77E-05	0.00E+00	0.00E+00	3.53E-02
211	ALL		389950	3780000	NonCancer	0.00E+00	7.76E-04	0.00E+00	7.72E-04	2.20E-06	7.82E-04	3.52E-02	0.00E+00	4.54E-06	0.00E+00	2.16E-07	5.98E-05	0.00E+00	0.00E+00	3.52E-02
268	ALL		390000	3780150	NonCancer	0.00E+00	7.83E-04	0.00E+00	7.80E-04	1.61E-06	7.88E-04	3.47E-02	0.00E+00	3.41E-06	0.00E+00	1.69E-07	4.74E-05	0.00E+00	0.00E+00	3.47E-02
727	ALL		390057	3779818	NonCancer	0.00E+00	7.47E-04	0.00E+00	7.43E-04	1.82E-06	7.56E-04	3.46E-02	0.00E+00	3.19E-06	0.00E+00	2.51E-07	6.88E-05	0.00E+00	0.00E+00	3.46E-02
179	ALL		389950	3779900	NonCancer	0.00E+00	7.46E-04	0.00E+00	7.41E-04	2.57E-06	7.54E-04	3.45E-02	0.00E+00	5.23E-06	0.00E+00	2.47E-07	6.80E-05	0.00E+00	0.00E+00	3.45E-02
199	ALL		390200	3779950	NonCancer	0.00E+00	8.01E-04	0.00E+00	7.99E-04	7.24E-07	8.03E-04	3.43E-02	0.00E+00	1.71E-06	0.00E+00	9.88E-08	2.89E-05	0.00E+00	0.00E+00	3.43E-02
290	ALL		390050	3780200	NonCancer	0.00E+00	7.81E-04	0.00E+00	7.78E-04	1.34E-06	7.85E-04	3.43E-02	0.00E+00	2.90E-06	0.00E+00	1.47E-07	4.15E-05	0.00E+00	0.00E+00	3.43E-02
253	ALL		390200	3780100	NonCancer	0.00E+00	7.84E-04	0.00E+00	7.82E-04	6.85E-07	7.86E-04	3.35E-02	0.00E+00	1.63E-06	0.00E+00	9.48E-08	2.78E-05	0.00E+00	0.00E+00	3.35E-02
733	ALL		390130	3779879	NonCancer	0.00E+00	7.63E-04	0.00E+00	7.60E-04	1.20E-06	7.66E-04	3.33E-02	0.00E+00	2.64E-06	0.00E+00	1.32E-07	3.74E-05	0.00E+00	0.00E+00	3.33E-02
229	ALL		389950	3780050	NonCancer	0.00E+00	7.29E-04	0.00E+00	7.26E-04	1.88E-06	7.34E-04	3.28E-02	0.00E+00	3.91E-06	0.00E+00	1.88E-07	5.23E-05	0.00E+00	0.00E+00	3.28E-02
292	ALL		390150	3780200	NonCancer	0.00E+00	7.50E-04	0.00E+00	7.49E-04	8.60E-07	7.53E-04	3.23E-02	0.00E+00	1.96E-06	0.00E+00	1.07E-07	3.08E-05	0.00E+00	0.00E+00	3.23E-02
721	ALL		389969	3779844	NonCancer	0.00E+00	6.87E-04	0.00E+00	6.83E-04	2.55E-06	6.95E-04	3.22E-02	0.00E+00	5.08E-06	0.00E+00	2.51E-07	6.89E-05	0.00E+00	0.00E+00	3.22E-02
734	ALL		390145	3779885	NonCancer	0.00E+00	7.40E-04	0.00E+00	7.38E-04	1.06E-06	7.43E-04	3.22E-02	0.00E+00	2.37E-06	0.00E+00	1.20E-07	3.44E-05	0.00E+00	0.00E+00	3.22E-02
728	ALL		390065	3779824	NonCancer	0.00E+00	6.92E-04	0.00E+00	6.89E-04	1.68E-06	7.00E-04	3.17E-02	0.00E+00	3.15E-06	0.00E+00	2.08E-07	5.75E-05	0.00E+00	0.00E+00	3.17E-02
731	ALL		390114.5	3779862	NonCancer	0.00E+00	7.18E-04	0.00E+00	7.16E-04	1.37E-06	7.22E-04	3.17E-02	0.00E+00	2.95E-06	0.00E+00	1.43E-07	4.02E-05	0.00E+00	0.00E+00	3.17E-02
732	ALL		390131	3779875	NonCancer	0.00E+00	7.19E-04	0.00E+00	7.17E-04	1.18E-06	7.22E-04	3.14E-02	0.00E+00	2.59E-06	0.00E+00	1.28E-07	3.63E-05	0.00E+00	0.00E+00	3.14E-02

CHRONIC 8-HR

*HARP - HRACalc v21081 5/4/2021 12:14:53 PM - Chronic 8Hr Risk - Input File: C:\Work\Bee\Glendale CA\Scholl Canyon 2021\HRA\Inner\SCHOLL CANYON INNER BORDER\hra\Chronic8InnerHRAInput.hra

REC	GRP	NETID	X	Y	SCENARIO	CV	CNS	IMMUN	KIDNEY	GILV	REPRO/DE	RESP	SKIN	EYE	BONE/TEE	ENDO	BLOOD	ODOR	GENERAL	MAXHI
725	ALL		390041	3779818	NonCancer	0.00E+00	6.46E-04	0.00E+00	6.12E-04	0.00E+00	6.12E-04	2.83E-02	0.00E+00	6.94E-06	0.00E+00	0.00E+00	5.10E-04	0.00E+00	0.00E+00	2.83E-02
724	ALL		390023	3779825	NonCancer	0.00E+00	2.56E-04	0.00E+00	2.44E-04	0.00E+00	2.44E-04	9.49E-03	0.00E+00	2.73E-06	0.00E+00	0.00E+00	1.76E-04	0.00E+00	0.00E+00	9.49E-03
168	ALL		390050	3779850	NonCancer	0.00E+00	2.68E-04	0.00E+00	2.57E-04	0.00E+00	2.57E-04	8.91E-03	0.00E+00	3.03E-06	0.00E+00	0.00E+00	1.68E-04	0.00E+00	0.00E+00	8.91E-03
726	ALL		390048	3779817	NonCancer	0.00E+00	2.25E-04	0.00E+00	2.15E-04	0.00E+00	2.15E-04	7.86E-03	0.00E+00	2.00E-06	0.00E+00	0.00E+00	1.47E-04	0.00E+00	0.00E+00	7.86E-03
181	ALL		390050	3779900	NonCancer	0.00E+00	2.66E-04	0.00E+00	2.57E-04	0.00E+00	2.57E-04	6.88E-03	0.00E+00	3.28E-06	0.00E+00	0.00E+00	1.38E-04	0.00E+00	0.00E+00	6.88E-03
180	ALL		390000	3779900	NonCancer	0.00E+00	2.19E-04	0.00E+00	2.11E-04	0.00E+00	2.11E-04	6.15E-03	0.00E+00	2.80E-06	0.00E+00	0.00E+00	1.20E-04	0.00E+00	0.00E+00	6.15E-03
167	ALL		390000	3779850	NonCancer	0.00E+00	1.90E-04	0.00E+00	1.82E-04	0.00E+00	1.82E-04	6.05E-03	0.00E+00	2.41E-06	0.00E+00	0.00E+00	1.15E-04	0.00E+00	0.00E+00	6.05E-03
723	ALL		390005	3779831	NonCancer	0.00E+00	1.75E-04	0.00E+00	1.68E-04	0.00E+00	1.68E-04	5.69E-03	0.00E+00	2.08E-06	0.00E+00	0.00E+00	1.08E-04	0.00E+00	0.00E+00	5.69E-03
196	ALL		390050	3779950	NonCancer	0.00E+00	2.43E-04	0.00E+00	2.36E-04	0.00E+00	2.36E-04	4.97E-03	0.00E+00	2.55E-06	0.00E+00	0.00E+00	1.06E-04	0.00E+00	0.00E+00	4.97E-03
195	ALL		390000	3779950	NonCancer	0.00E+00	2.07E-04	0.00E+00	2.01E-04	0.00E+00	2.01E-04	4.92E-03	0.00E+00	2.40E-06	0.00E+00	0.00E+00	1.00E-04	0.00E+00	0.00E+00	4.92E-03
722	ALL		389987	3779838	NonCancer	0.00E+00	1.46E-04	0.00E+00	1.40E-04	0.00E+00	1.40E-04	4.38E-03	0.00E+00	1.82E-06	0.00E+00	0.00E+00	8.45E-05	0.00E+00	0.00E+00	4.38E-03
760	ALL		390045	3779776	NonCancer	0.00E+00	1.43E-04	0.00E+00	1.37E-04	0.00E+00	1.37E-04	4.31E-03	0.00E+00	1.43E-06	0.00E+00	0.00E+00	8.30E-05	0.00E+00	0.00E+00	4.31E-03
759	ALL		390059	3779780	NonCancer	0.00E+00	1.45E-04	0.00E+00	1.40E-04	0.00E+00	1.40E-04	4.29E-03	0.00E+00	1.42E-06	0.00E+00	0.00E+00	8.31E-05	0.00E+00	0.00E+00	4.29E-03
212	ALL		390000	3780000	NonCancer	0.00E+00	1.86E-04	0.00E+00	1.81E-04	0.00E+00	1.81E-04	3.80E-03	0.00E+00	1.91E-06	0.00E+00	0.00E+00	8.07E-05	0.00E+00	0.00E+00	3.80E-03
213	ALL		390050	3780000	NonCancer	0.00E+00	2.21E-04	0.00E+00	2.15E-04	0.00E+00	2.15E-04	3.71E-03	0.00E+00	1.96E-06	0.00E+00	0.00E+00	8.37E-05	0.00E+00	0.00E+00	3.71E-03
721	ALL		389969	3779844	NonCancer	0.00E+00	1.25E-04	0.00E+00	1.20E-04	0.00E+00	1.20E-04	3.52E-03	0.00E+00	1.58E-06	0.00E+00	0.00E+00	6.88E-05	0.00E+00	0.00E+00	3.52E-03
727	ALL		390057	3779818	NonCancer	0.00E+00	1.35E-04	0.00E+00	1.31E-04	0.00E+00	1.31E-04	3.43E-03	0.00E+00	9.91E-07	0.00E+00	0.00E+00	6.88E-05	0.00E+00	0.00E+00	3.43E-03
179	ALL		389950	3779900	NonCancer	0.00E+00	1.35E-04	0.00E+00	1.30E-04	0.00E+00	1.30E-04	3.37E-03	0.00E+00	1.62E-06	0.00E+00	0.00E+00	6.80E-05	0.00E+00	0.00E+00	3.37E-03
194	ALL		389950	3779950	NonCancer	0.00E+00	1.44E-04	0.00E+00	1.39E-04	0.00E+00	1.39E-04	3.17E-03	0.00E+00	1.57E-06	0.00E+00	0.00E+00	6.59E-05	0.00E+00	0.00E+00	3.17E-03
758	ALL		390075	3779786	NonCancer	0.00E+00	1.22E-04	0.00E+00	1.18E-04	0.00E+00	1.18E-04	2.98E-03	0.00E+00	1.15E-06	0.00E+00	0.00E+00	6.02E-05	0.00E+00	0.00E+00	2.98E-03
761	ALL		390024	3779772	NonCancer	0.00E+00	1.10E-04	0.00E+00	1.06E-04	0.00E+00	1.06E-04	2.97E-03	0.00E+00	1.16E-06	0.00E+00	0.00E+00	5.87E-05	0.00E+00	0.00E+00	2.97E-03
230	ALL		390000	3780050	NonCancer	0.00E+00	1.73E-04	0.00E+00	1.68E-04	0.00E+00	1.68E-04	2.96E-03	0.00E+00	1.53E-06	0.00E+00	0.00E+00	6.64E-05	0.00E+00	0.00E+00	2.96E-03
231	ALL		390050	3780050	NonCancer	0.00E+00	1.98E-04	0.00E+00	1.93E-04	0.00E+00	1.93E-04	2.87E-03	0.00E+00	1.55E-06	0.00E+00	0.00E+00	6.81E-05	0.00E+00	0.00E+00	2.87E-03
166	ALL		389950	3779850	NonCancer	0.00E+00	1.07E-04	0.00E+00	1.04E-04	0.00E+00	1.04E-04	2.85E-03	0.00E+00	1.33E-06	0.00E+00	0.00E+00	5.66E-05	0.00E+00	0.00E+00	2.85E-03
142	ALL		390050	3779750	NonCancer	0.00E+00	1.10E-04	0.00E+00	1.06E-04	0.00E+00	1.06E-04	2.83E-03	0.00E+00	1.20E-06	0.00E+00	0.00E+00	5.66E-05	0.00E+00	0.00E+00	2.83E-03
720	ALL		389966.5	3779830	NonCancer	0.00E+00	1.05E-04	0.00E+00	1.01E-04	0.00E+00	1.01E-04	2.81E-03	0.00E+00	1.28E-06	0.00E+00	0.00E+00	5.57E-05	0.00E+00	0.00E+00	2.81E-03
211	ALL		389950	3780000	NonCancer	0.00E+00	1.40E-04	0.00E+00	1.36E-04	0.00E+00	1.36E-04	2.79E-03	0.00E+00	1.41E-06	0.00E+00	0.00E+00	5.98E-05	0.00E+00	0.00E+00	2.79E-03
728	ALL		390065	3779824	NonCancer	0.00E+00	1.25E-04	0.00E+00	1.21E-04	0.00E+00	1.21E-04	2.76E-03	0.00E+00	9.78E-07	0.00E+00	0.00E+00	5.75E-05	0.00E+00	0.00E+00	2.76E-03
762	ALL		390016	3779767	NonCancer	0.00E+00	9.94E-05	0.00E+00	9.60E-05	0.00E+00	9.60E-05	2.58E-03	0.00E+00	1.09E-06	0.00E+00	0.00E+00	5.14E-05	0.00E+00	0.00E+00	2.58E-03
197	ALL		390100	3779950	NonCancer	0.00E+00	2.35E-04	0.00E+00	2.30E-04	0.00E+00	2.30E-04	2.53E-03	0.00E+00	1.51E-06	0.00E+00	0.00E+00	6.76E-05	0.00E+00	0.00E+00	2.53E-03
757	ALL		390089	3779793	NonCancer	0.00E+00	1.12E-04	0.00E+00	1.08E-04	0.00E+00	1.08E-04	2.44E-03	0.00E+00	1.07E-06	0.00E+00	0.00E+00	5.09E-05	0.00E+00	0.00E+00	2.44E-03
249	ALL		390000	3780100	NonCancer	0.00E+00	1.55E-04	0.00E+00	1.51E-04	0.00E+00	1.51E-04	2.38E-03	0.00E+00	1.25E-06	0.00E+00	0.00E+00	5.53E-05	0.00E+00	0.00E+00	2.38E-03
229	ALL		389950	3780050	NonCancer	0.00E+00	1.31E-04	0.00E+00	1.28E-04	0.00E+00	1.28E-04	2.37E-03	0.00E+00	1.21E-06	0.00E+00	0.00E+00	5.23E-05	0.00E+00	0.00E+00	2.37E-03
214	ALL		390100	3780000	NonCancer	0.00E+00	2.36E-04	0.00E+00	2.32E-04	0.00E+00	2.32E-04	2.35E-03	0.00E+00	1.42E-06	0.00E+00	0.00E+00	6.51E-05	0.00E+00	0.00E+00	2.35E-03
250	ALL		390050	3780100	NonCancer	0.00E+00	1.89E-04	0.00E+00	1.85E-04	0.00E+00	1.85E-04	2.32E-03	0.00E+00	1.29E-06	0.00E+00	0.00E+00	5.86E-05	0.00E+00	0.00E+00	2.32E-03
182	ALL		390100	3779900	NonCancer	0.00E+00	1.91E-04	0.00E+00	1.87E-04	0.00E+00	1.87E-04	2.27E-03	0.00E+00	1.33E-06	0.00E+00	0.00E+00	5.83E-05	0.00E+00	0.00E+00	2.27E-03
729	ALL		390081.5	3779837	NonCancer	0.00E+00	1.23E-04	0.00E+00	1.20E-04	0.00E+00	1.20E-04	2.26E-03	0.00E+00	1.05E-06	0.00E+00	0.00E+00	4.97E-05	0.00E+00	0.00E+00	2.26E-03
763	ALL		390009	3779758	NonCancer	0.00E+00	8.94E-05	0.00E+00	8.64E-05	0.00E+00	8.64E-05	2.22E-03	0.00E+00	1.00E-06	0.00E+00	0.00E+00	4.48E-05	0.00E+00	0.00E+00	2.22E-03
143	ALL		390100	3779750	NonCancer	0.00E+00	1.05E-04	0.00E+00	1.02E-04	0.00E+00	1.02E-04	2.15E-03	0.00E+00	1.06E-06	0.00E+00	0.00E+00	4.57E-05	0.00E+00	0.00E+00	2.15E-03
719	ALL		389964	3779816	NonCancer	0.00E+00	8.69E-05	0.00E+00	8.41E-05	0.00E+00	8.41E-05	2.13E-03	0.00E+00	1.01E-06	0.00E+00	0.00E+00	4.31E-05	0.00E+00	0.00E+00	2.13E-03
193	ALL		389900	3779950	NonCancer	0.00E+00	1.01E-04	0.00E+00	9.85E-05	0.00E+00	9.85E-05	2.13E-03	0.00E+00	1.07E-06	0.00E+00	0.00E+00	4.48E-05	0.00E+00	0.00E+00	2.13E-03
178	ALL		389900	3779900	NonCancer	0.00E+00	9.04E-05	0.00E+00	8.75E-05	0.00E+00	8.75E-05	2.09E-03	0.00E+00	1.03E-06	0.00E+00	0.00E+00	4.30E-05	0.00E+00	0.00E+00	2.09E-03
756	ALL		390107	3779805	NonCancer	0.00E+00	9.89E-05	0.00E+00	9.60E-05	0.00E+00	9.60E-05	2.09E-03	0.00E+00	1.02E-06	0.00E+00	0.00E+00	4.40E-05	0.00E+00	0.00E+00	2.09E-03
764	ALL		390005	3779753	NonCancer	0.00E+00	8.46E-05	0.00E+00	8.18E-05	0.00E+00	8.18E-05	2.05E-03	0.00E+00	9.53E-07	0.00E+00	0.00E+00	4.17E-05	0.00E+00	0.00E+00	2.05E-03
232	ALL		390100	3780050	NonCancer	0.00E+00	2.14E-04	0.00E+00	2.10E-04	0.00E+00	2.10E-04	2.05E-03	0.00E+00	1.23E-06	0.00E+00	0.00E+00	5.77E-05	0.00E+00	0.00E+00	2.05E-03
248	ALL		389950	3780100	NonCancer	0.00E+00	1.20E-04	0.00E+00	1.17E-04	0.00E+00	1.17E-04	2.04E-03	0.00E+00	1.06E-06	0.00E+00	0.00E+00	4.59E-05	0.00E+00	0.00E+00	2.04E-03
268	ALL		390000	3780150	NonCancer	0.00E+00	1.41E-04	0.00E+00	1.37E-04	0.00E+00	1.37E-04	1.97E-03	0.00E+00	1.06E-06	0.00E+00	0.00E+00	4.74E-05	0.00E+00	0.00E+00	1.97E-03
210	ALL		389900	3780000	NonCancer	0.00E+00	1.04E-04	0.00E+00	1.01E-04	0.00E+00	1.01E-04	1.97E-03	0.00E+00	1.01E-06	0.00E+00	0.00E+00	4.27E-05	0.00E+00	0.00E+00	1.97E-03
730	ALL		390098	3779850	NonCancer	0.00E+00	1.27E-04	0.00E+00	1.24E-04	0.00E+00	1.24E-04	1.93E-03	0.00E+00	1.02E-06	0.00E+00	0.00E+00	4.50E-05	0.00E+00	0.00E+00	1.93E-03
141	ALL		390000	3779750	NonCancer	0.00E+00	8.05E-05	0.00E+00	7.79E-05	0.00E+00	7.79E-05	1.92E-03	0.00E+00	9.08E-07	0.00E+00	0.00E+00	3.92E-05	0.00E+00	0.00E+00	1.92E-03
269	ALL		390050	3780150	NonCancer	0.00E+00	1.62E-04	0.00E+00	1.59E-04	0.00E+00	1.59E-04	1.89E-03	0.00E+00	1.07E-06	0.00E+00	0.00E+00	4.89E-05	0.00E+00	0.00E+00	1.89E-03
755	ALL		390120	3779815	NonCancer	0.00E+00	7.79E-05	0.00E+00	7.55E-05	0.00E+00	7.55E-05	1.80E-03	0.00E+00	9.12E-07	0.00E+00	0.00E+00	3.69E-05	0.00E+00	0.00E+00	1.80E-03
228	ALL		389900	3780050	NonCancer	0.00E+00	1.01E-04	0.00E+00	9.81E-05	0.00E+00	9.81E-05	1.77E-03	0.00E+00	9.19E-07	0.00E+00	0.00E+00	3.94E-05	0.00E+00	0.00E+00	1.77E-03

ACUTE

*HARP - HRACalc v21081 5/4/2021 12:09:27 PM - Acute Risk - Input File: C:\Work\Bee\Glendale CA\Scholl Canyon 2021\HRA\Inner\SCHOLL CANYON INNER BORDER\hra\AcuteInnerHRAInput.hra

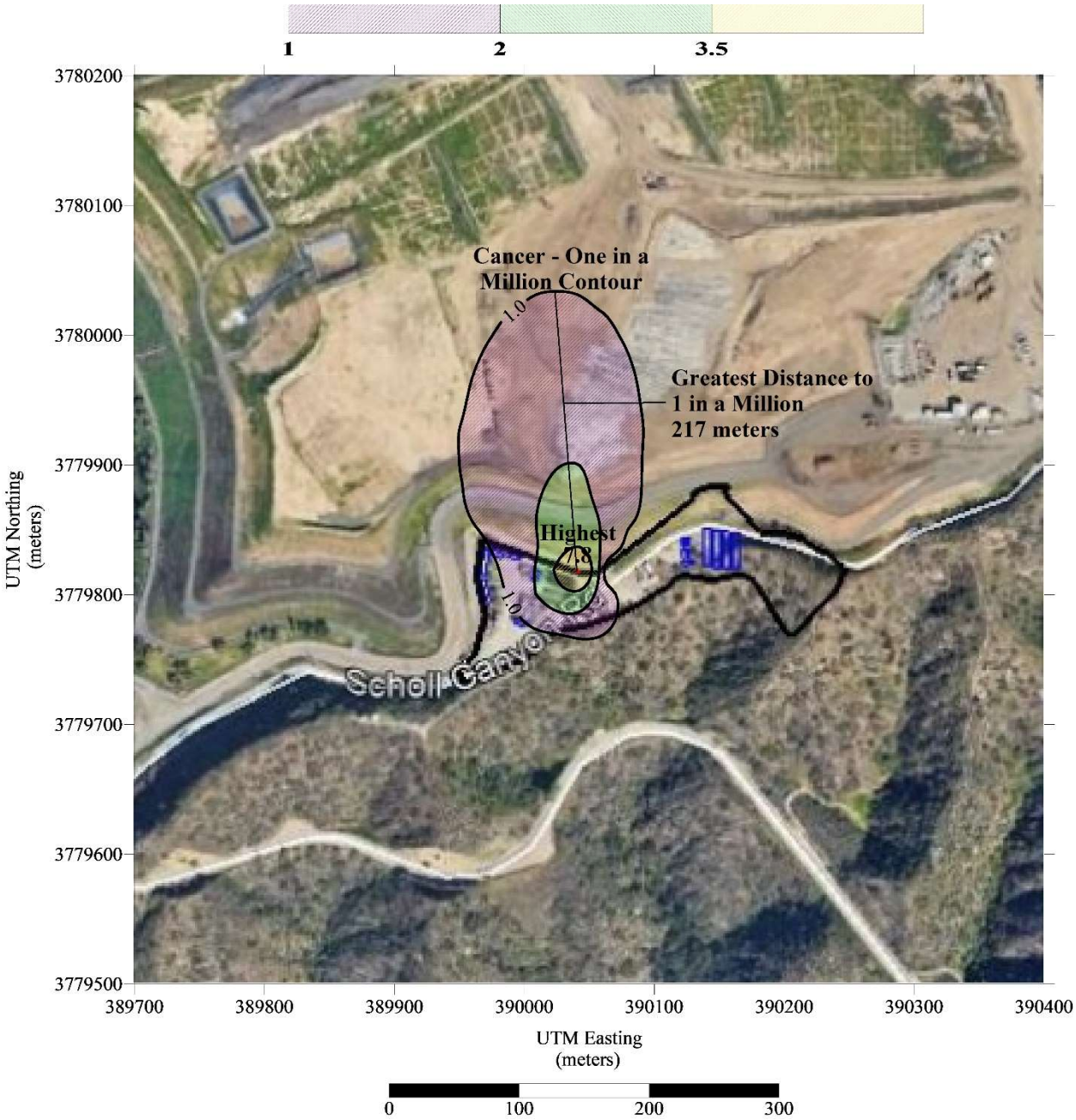
REC	GRP	NETID	X	Y	SCENARIO	CV	CNS	IMMUN	KIDNEY	GILV	REPRO/DE	RESP	SKIN	EYE	BONE/TEE	ENDO	BLOOD	ODOR	GENERAL	MAXHI
725	ALL		390041	3779818	NonCancer	0.00E+00	1.81E-02	2.74E-03	0.00E+00	9.33E-07	5.60E-03	2.95E-02	0.00E+00	2.55E-01	0.00E+00	0.00E+00	2.74E-03	0.00E+00	0.00E+00	2.55E-01
726	ALL		390048	3779817	NonCancer	0.00E+00	1.23E-02	1.86E-03	0.00E+00	6.33E-07	3.86E-03	2.06E-02	0.00E+00	1.73E-01	0.00E+00	0.00E+00	1.86E-03	0.00E+00	0.00E+00	1.73E-01
724	ALL		390023	3779825	NonCancer	0.00E+00	1.09E-02	1.64E-03	0.00E+00	5.57E-07	3.41E-03	1.83E-02	0.00E+00	1.53E-01	0.00E+00	0.00E+00	1.64E-03	0.00E+00	0.00E+00	1.53E-01
760	ALL		390045	3779776	NonCancer	0.00E+00	9.02E-03	1.36E-03	0.00E+00	4.60E-07	2.84E-03	1.53E-02	0.00E+00	1.26E-01	0.00E+00	0.00E+00	1.36E-03	0.00E+00	0.00E+00	1.26E-01
759	ALL		390059	3779780	NonCancer	0.00E+00	8.14E-03	1.22E-03	0.00E+00	4.14E-07	2.57E-03	1.40E-02	0.00E+00	1.14E-01	0.00E+00	0.00E+00	1.22E-03	0.00E+00	0.00E+00	1.14E-01
727	ALL		390057	3779818	NonCancer	0.00E+00	7.60E-03	1.14E-03	0.00E+00	3.85E-07	2.41E-03	1.32E-02	0.00E+00	1.06E-01	0.00E+00	0.00E+00	1.14E-03	0.00E+00	0.00E+00	1.06E-01
723	ALL		390005	3779831	NonCancer	0.00E+00	6.47E-03	9.68E-04	0.00E+00	3.28E-07	2.06E-03	1.13E-02	0.00E+00	9.01E-02	0.00E+00	0.00E+00	9.68E-04	0.00E+00	0.00E+00	9.01E-02
761	ALL		390024	3779772	NonCancer	0.00E+00	5.20E-03	7.73E-04	0.00E+00	2.60E-07	1.68E-03	9.40E-03	0.00E+00	7.18E-02	0.00E+00	0.00E+00	7.73E-04	0.00E+00	0.00E+00	7.18E-02
762	ALL		390016	3779767	NonCancer	0.00E+00	4.88E-03	7.25E-04	0.00E+00	2.44E-07	1.58E-03	8.89E-03	0.00E+00	6.73E-02	0.00E+00	0.00E+00	7.25E-04	0.00E+00	0.00E+00	6.73E-02
728	ALL		390065	3779824	NonCancer	0.00E+00	4.65E-03	6.89E-04	0.00E+00	2.32E-07	1.51E-03	8.57E-03	0.00E+00	6.40E-02	0.00E+00	0.00E+00	6.89E-04	0.00E+00	0.00E+00	6.40E-02
758	ALL		390075	3779786	NonCancer	0.00E+00	4.18E-03	6.19E-04	0.00E+00	2.08E-07	1.36E-03	7.75E-03	0.00E+00	5.75E-02	0.00E+00	0.00E+00	6.19E-04	0.00E+00	0.00E+00	5.75E-02
142	ALL		390050	3779750	NonCancer	0.00E+00	4.16E-03	6.08E-04	0.00E+00	2.03E-07	1.38E-03	8.13E-03	0.00E+00	5.64E-02	0.00E+00	0.00E+00	6.08E-04	0.00E+00	0.00E+00	5.64E-02
763	ALL		390009	3779758	NonCancer	0.00E+00	3.95E-03	5.83E-04	0.00E+00	1.95E-07	1.29E-03	7.41E-03	0.00E+00	5.41E-02	0.00E+00	0.00E+00	5.83E-04	0.00E+00	0.00E+00	5.41E-02
722	ALL		389987	3779838	NonCancer	0.00E+00	3.84E-03	5.68E-04	0.00E+00	1.91E-07	1.26E-03	7.18E-03	0.00E+00	5.27E-02	0.00E+00	0.00E+00	5.68E-04	0.00E+00	0.00E+00	5.27E-02
168	ALL		390050	3779850	NonCancer	0.00E+00	3.81E-03	5.59E-04	0.00E+00	1.87E-07	1.26E-03	7.33E-03	0.00E+00	5.19E-02	0.00E+00	0.00E+00	5.59E-04	0.00E+00	0.00E+00	5.19E-02
167	ALL		390000	3779850	NonCancer	0.00E+00	3.79E-03	5.58E-04	0.00E+00	1.87E-07	1.25E-03	7.19E-03	0.00E+00	5.18E-02	0.00E+00	0.00E+00	5.58E-04	0.00E+00	0.00E+00	5.18E-02
757	ALL		390089	3779793	NonCancer	0.00E+00	3.62E-03	5.35E-04	0.00E+00	1.79E-07	1.19E-03	6.80E-03	0.00E+00	4.96E-02	0.00E+00	0.00E+00	5.35E-04	0.00E+00	0.00E+00	4.96E-02
764	ALL		390005	3779753	NonCancer	0.00E+00	3.52E-03	5.17E-04	0.00E+00	1.73E-07	1.16E-03	6.72E-03	0.00E+00	4.80E-02	0.00E+00	0.00E+00	5.17E-04	0.00E+00	0.00E+00	4.80E-02
141	ALL		390000	3779750	NonCancer	0.00E+00	3.21E-03	4.70E-04	0.00E+00	1.57E-07	1.06E-03	6.22E-03	0.00E+00	4.36E-02	0.00E+00	0.00E+00	4.70E-04	0.00E+00	0.00E+00	4.36E-02
756	ALL		390107	3779805	NonCancer	0.00E+00	3.05E-03	4.43E-04	0.00E+00	1.47E-07	1.03E-03	6.21E-03	0.00E+00	4.10E-02	0.00E+00	0.00E+00	4.43E-04	0.00E+00	0.00E+00	4.10E-02
729	ALL		390081.5	3779837	NonCancer	0.00E+00	2.91E-03	4.24E-04	0.00E+00	1.41E-07	9.81E-04	5.86E-03	0.00E+00	3.92E-02	0.00E+00	0.00E+00	4.24E-04	0.00E+00	0.00E+00	3.92E-02
720	ALL		389966.5	3779830	NonCancer	0.00E+00	2.85E-03	4.16E-04	0.00E+00	1.39E-07	9.48E-04	5.58E-03	0.00E+00	3.86E-02	0.00E+00	0.00E+00	4.16E-04	0.00E+00	0.00E+00	3.86E-02
755	ALL		390120	3779815	NonCancer	0.00E+00	2.87E-03	4.10E-04	0.00E+00	1.34E-07	1.00E-03	6.29E-03	0.00E+00	3.78E-02	0.00E+00	0.00E+00	4.10E-04	0.00E+00	0.00E+00	3.78E-02
721	ALL		389969	3779844	NonCancer	0.00E+00	2.74E-03	4.00E-04	0.00E+00	1.33E-07	9.12E-04	5.37E-03	0.00E+00	3.71E-02	0.00E+00	0.00E+00	4.00E-04	0.00E+00	0.00E+00	3.71E-02
730	ALL		390098	3779850	NonCancer	0.00E+00	2.75E-03	3.97E-04	0.00E+00	1.31E-07	9.40E-04	5.72E-03	0.00E+00	3.67E-02	0.00E+00	0.00E+00	3.97E-04	0.00E+00	0.00E+00	3.67E-02
143	ALL		390100	3779750	NonCancer	0.00E+00	2.76E-03	3.91E-04	0.00E+00	1.28E-07	9.72E-04	6.16E-03	0.00E+00	3.60E-02	0.00E+00	0.00E+00	3.91E-04	0.00E+00	0.00E+00	3.60E-02
765	ALL		389985	3779745	NonCancer	0.00E+00	2.55E-03	3.70E-04	0.00E+00	1.23E-07	8.59E-04	5.13E-03	0.00E+00	3.43E-02	0.00E+00	0.00E+00	3.70E-04	0.00E+00	0.00E+00	3.43E-02
719	ALL		389964	3779816	NonCancer	0.00E+00	2.49E-03	3.63E-04	0.00E+00	1.21E-07	8.38E-04	4.99E-03	0.00E+00	3.36E-02	0.00E+00	0.00E+00	3.63E-04	0.00E+00	0.00E+00	3.36E-02
716	ALL		389966.5	3779770	NonCancer	0.00E+00	2.49E-03	3.62E-04	0.00E+00	1.21E-07	8.36E-04	4.98E-03	0.00E+00	3.36E-02	0.00E+00	0.00E+00	3.62E-04	0.00E+00	0.00E+00	3.36E-02
731	ALL		390114.5	3779862	NonCancer	0.00E+00	2.42E-03	3.44E-04	0.00E+00	1.13E-07	8.50E-04	5.36E-03	0.00E+00	3.17E-02	0.00E+00	0.00E+00	3.44E-04	0.00E+00	0.00E+00	3.17E-02
717	ALL		389971	3779786	NonCancer	0.00E+00	2.31E-03	3.34E-04	0.00E+00	1.11E-07	7.83E-04	4.73E-03	0.00E+00	3.09E-02	0.00E+00	0.00E+00	3.34E-04	0.00E+00	0.00E+00	3.09E-02
715	ALL		389962	3779754	NonCancer	0.00E+00	2.19E-03	3.17E-04	0.00E+00	1.05E-07	7.44E-04	4.49E-03	0.00E+00	2.94E-02	0.00E+00	0.00E+00	3.17E-04	0.00E+00	0.00E+00	2.94E-02
754	ALL		390144	3779811	NonCancer	0.00E+00	2.23E-03	3.14E-04	0.00E+00	1.02E-07	7.96E-04	5.12E-03	0.00E+00	2.89E-02	0.00E+00	0.00E+00	3.14E-04	0.00E+00	0.00E+00	2.89E-02
766	ALL		389973	3779740	NonCancer	0.00E+00	2.14E-03	3.09E-04	0.00E+00	1.02E-07	7.32E-04	4.46E-03	0.00E+00	2.86E-02	0.00E+00	0.00E+00	3.09E-04	0.00E+00	0.00E+00	2.86E-02
180	ALL		390000	3779900	NonCancer	0.00E+00	2.19E-03	3.08E-04	0.00E+00	1.00E-07	7.79E-04	5.00E-03	0.00E+00	2.84E-02	0.00E+00	0.00E+00	3.08E-04	0.00E+00	0.00E+00	2.84E-02
166	ALL		389950	3779850	NonCancer	0.00E+00	2.06E-03	2.97E-04	0.00E+00	9.83E-08	7.01E-04	4.25E-03	0.00E+00	2.75E-02	0.00E+00	0.00E+00	2.97E-04	0.00E+00	0.00E+00	2.75E-02
125	ALL		390050	3779700	NonCancer	0.00E+00	2.04E-03	2.84E-04	0.00E+00	9.20E-08	7.37E-04	4.81E-03	0.00E+00	2.62E-02	0.00E+00	0.00E+00	2.84E-04	0.00E+00	0.00E+00	2.62E-02
732	ALL		390131	3779875	NonCancer	0.00E+00	1.99E-03	2.81E-04	0.00E+00	9.19E-08	7.02E-04	4.45E-03	0.00E+00	2.60E-02	0.00E+00	0.00E+00	2.81E-04	0.00E+00	0.00E+00	2.60E-02
156	ALL		390150	3779800	NonCancer	0.00E+00	2.02E-03	2.78E-04	0.00E+00	8.91E-08	7.46E-04	4.99E-03	0.00E+00	2.55E-02	0.00E+00	0.00E+00	2.78E-04	0.00E+00	0.00E+00	2.55E-02
140	ALL		389950	3779750	NonCancer	0.00E+00	1.91E-03	2.75E-04	0.00E+00	9.08E-08	6.54E-04	4.00E-03	0.00E+00	2.54E-02	0.00E+00	0.00E+00	2.75E-04	0.00E+00	0.00E+00	2.54E-02
733	ALL		390130	3779879	NonCancer	0.00E+00	1.90E-03	2.69E-04	0.00E+00	8.79E-08	6.75E-04	4.30E-03	0.00E+00	2.49E-02	0.00E+00	0.00E+00	2.69E-04	0.00E+00	0.00E+00	2.49E-02
753	ALL		390165	3779815	NonCancer	0.00E+00	1.92E-03	2.69E-04	0.00E+00	8.70E-08	6.95E-04	4.53E-03	0.00E+00	2.48E-02	0.00E+00	0.00E+00	2.69E-04	0.00E+00	0.00E+00	2.48E-02
767	ALL		389963	3779735	NonCancer	0.00E+00	1.84E-03	2.64E-04	0.00E+00	8.68E-08	6.39E-04	3.96E-03	0.00E+00	2.44E-02	0.00E+00	0.00E+00	2.64E-04	0.00E+00	0.00E+00	2.44E-02
714	ALL		389949	3779744	NonCancer	0.00E+00	1.80E-03	2.58E-04	0.00E+00	8.51E-08	6.22E-04	3.84E-03	0.00E+00	2.39E-02	0.00E+00	0.00E+00	2.58E-04	0.00E+00	0.00E+00	2.39E-02
124	ALL		390000	3779700	NonCancer	0.00E+00	1.84E-03	2.59E-04	0.00E+00	8.40E-08	6.59E-04	4.25E-03	0.00E+00	2.38E-02	0.00E+00	0.00E+00	2.59E-04	0.00E+00	0.00E+00	2.38E-02
718	ALL		389967.5	3779801	NonCancer	0.00E+00	1.78E-03	2.54E-04	0.00E+00	8.31E-08	6.23E-04	3.91E-03	0.00E+00	2.34E-02	0.00E+00	0.00E+00	2.54E-04	0.00E+00	0.00E+00	2.34E-02
752	ALL		390176	3779810	NonCancer	0.00E+00	1.85E-03	2.52E-04	0.00E+00	7.99E-08	7.03E-04	4.83E-03	0.00E+00	2.31E-02	0.00E+00	0.00E+00	2.52E-04	0.00E+00	0.00E+00	2.31E-02
126	ALL		390100	3779700	NonCancer	0.00E+00	1.84E-03	2.51E-04	0.00E+00	7.99E-08	6.96E-04	4.76E-03	0.00E+00	2.31E-02	0.00E+00	0.00E+00	2.51E-04	0.00E+00	0.00E+00	2.31E-02
736	ALL		390153	3779879	NonCancer	0.00E+00	1.73E-03	2.42E-04	0.00E+00	7.83E-08	6.26E-04	4.08E-03	0.00E+00	2.23E-02	0.00E+00	0.00E+00	2.42E-04	0.00E+00	0.00E+00	2.23E-02
734	ALL		390145	3779885	NonCancer	0.00E+00	1.71E-03	2.41E-04	0.00E+00	7.83E-08	6.12E-04	3.94E-03	0.00E+00	2.22E-02	0.00E+00	0.00E+00	2.41E-04	0.00E+00	0.00E+00	2.22E-02
713	ALL		389954	3779731	NonCancer	0.00E+00	1.68E-03	2.40E-04	0.00E+00	7.87E-08	5.88E-04	3.68E-03	0.00E+00	2.22E-02	0.00E+00	0.00E+00	2.40E-04	0.00E+00	0.00E+00	2.22E-02
768	ALL		389954	3779731	NonCancer	0.00E+00	1.68E-03	2.40E-04	0.00E+00	7.87E-08	5.88E-04	3.68E-03	0.00E+00	2.22E-02	0.00E+00	0.00E+00	2.40E-04	0.00E+00	0.00E+00	2.22E-02
735	ALL		390157	3779884	NonCancer	0.00E+00	1.68E-03	2.33E-04	0.00E+00	7.50E-08	6.12E-04	4.04E-03	0.00E+00	2.14E-02	0.00E+00	0.00E+00	2.33E-04	0.00E+00	0.00E+00	2.14E-02

POST LANDFILL CLOSURE

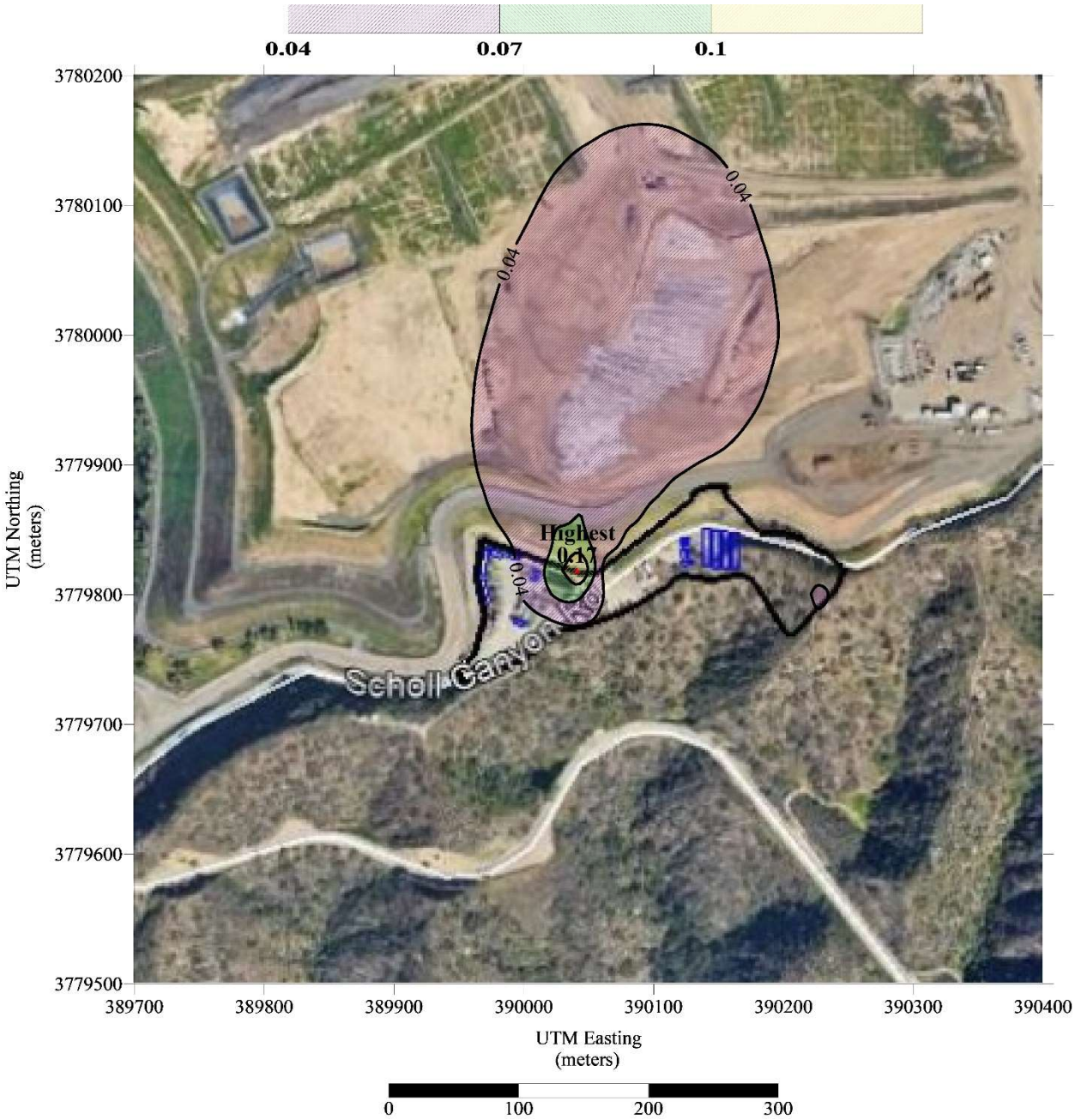
SITE MAPS SHOWING THE LOCATIONS OF MODELING RESULTS

CANCER RISK OUTPUT

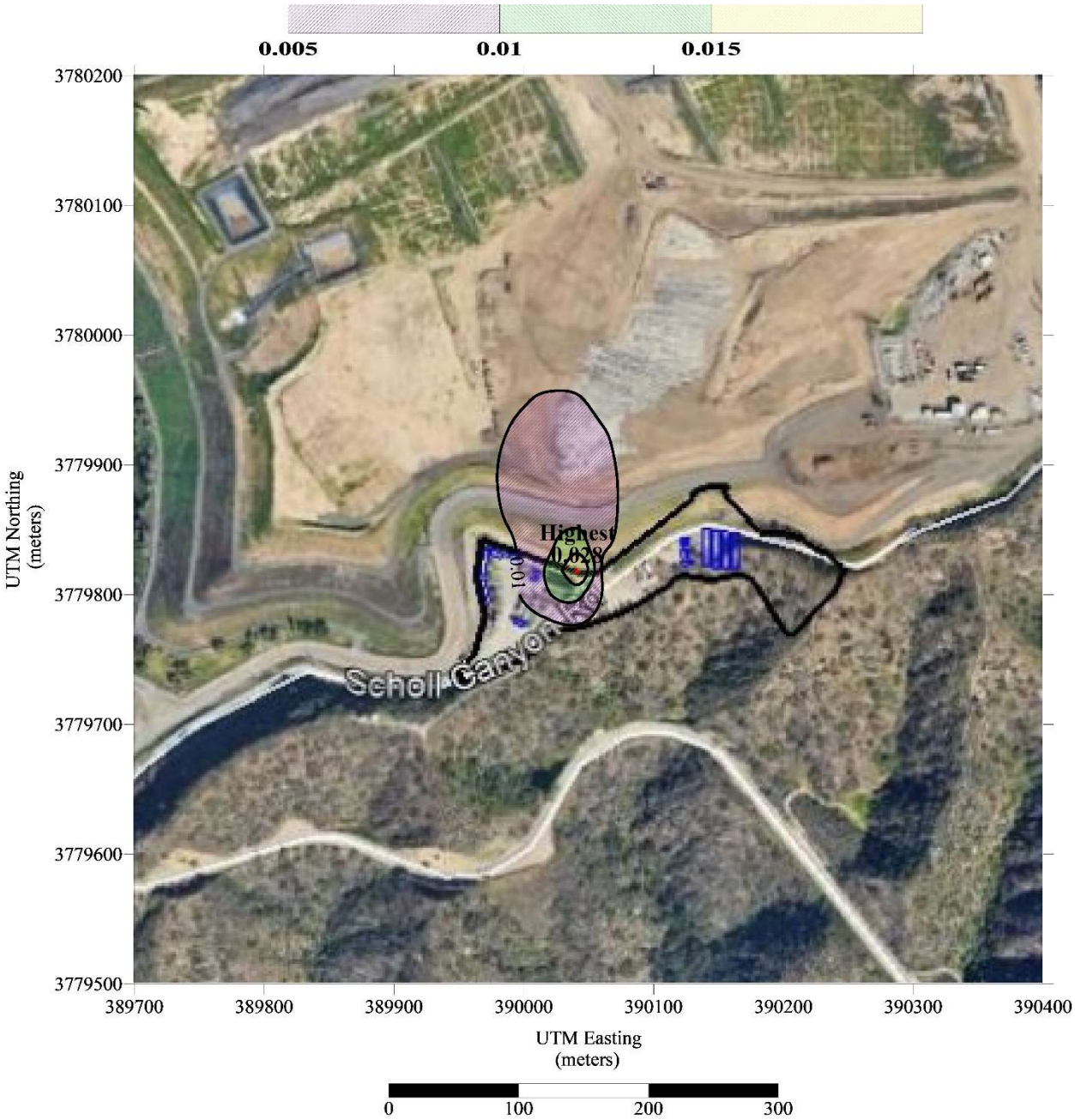
(UNIT OF MEASUREMENT: IN ONE MILLION)



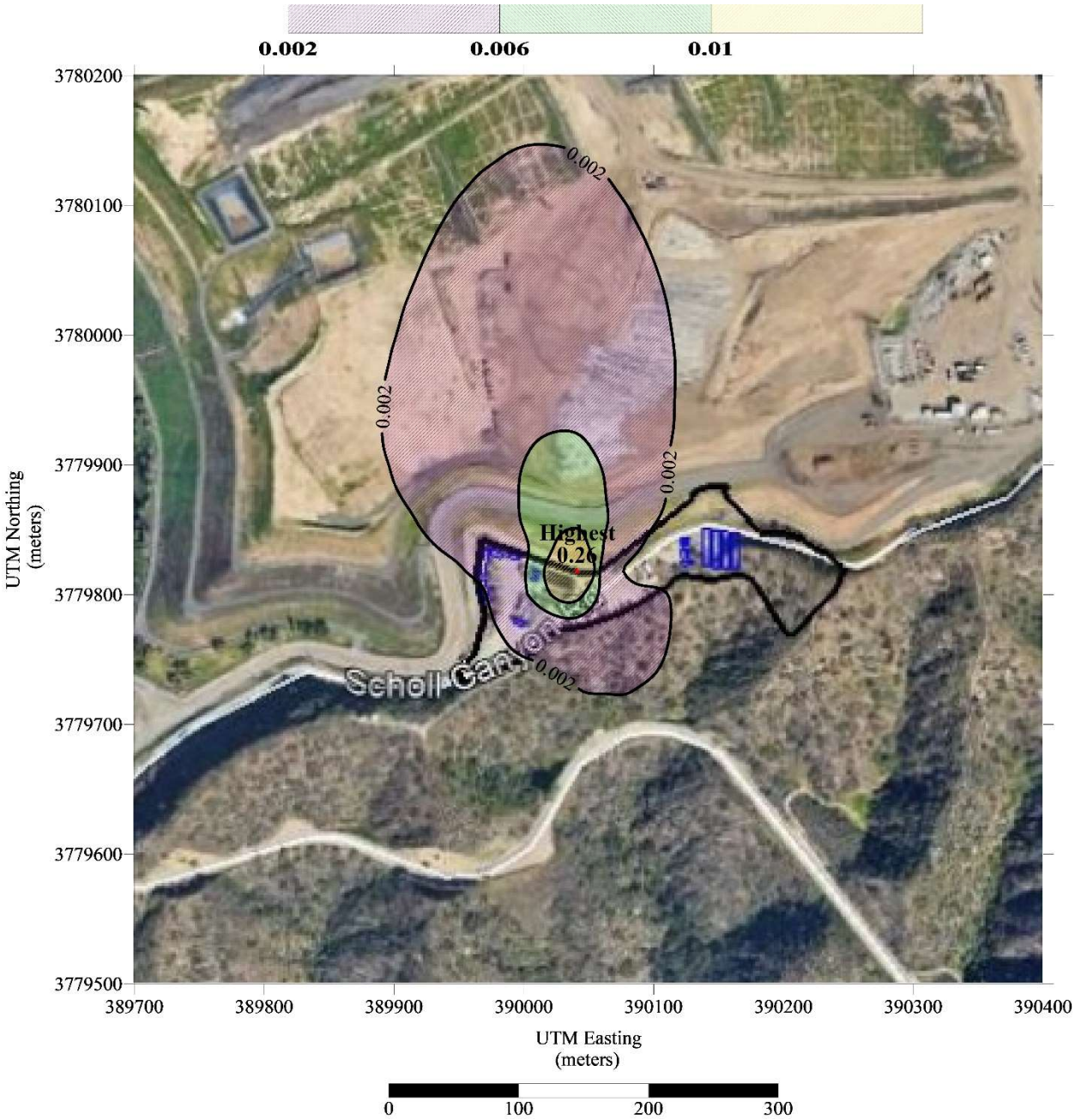
CHRONIC OUTPUT



CHRONIC 8-HOUR OUTPUT



ACUTE OUTPUT



Errata Attachment D: Updated Project GHG Emission Inventory

GREENHOUSE GASES EMISSION INVENTORY
BIOGAS RENEWABLE GENERATION PROJECT

Greenhouse Gases	GWP[1]	Landfill gas emission factor[2], kg/mmBtu	Natural gas emission factor[2], kg/mmBtu
CO_2	1	52.07	53.06
CH_4	25	0.0032	0.001
N_2O	298	0.00063	0.0001

NOTES:

[1]GWP = Global Warming Potential. [Source: IPCC, 4th Assessment Report, 2007]

[2]Source: USEPA website: http://www.epa.gov/climateleadership/documents/emission-factors.pdf for CH4 and N2O

GHG Emissions Project

Device/Activity	Max. Fuel consumption, MMBtu/hr	Annual Op. hours	CO_2, MT/year	CH_4, MT/year	N_2O, MT/year	Total CO_2e, MT/year
Facility	135.2592	8760	61696.21	3.791586	0.74646847	62,013
Construction[1]			256.7049	0.057	0	258
Facility Occupants[1]			48.9613	0.1245	1.29E-03	52
					Total Project GHG Emissions:	62,324

NOTES:

[1]GHG emissions are estimated by using CalEEmod.

Baseline GHG Emissions

Existing Equipment Type	LFG Flow, MMbtu/yr	CO_2, MT/year	CH_4, MT/year	N_2O, MT/year	CO_2e, MT/year
Flares	1184870.592	61,696	3.79	0.75	62,013

Errata Attachment E: Noise Monitoring Sheets

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon LA County
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10·21·15
Stantec Technician:	S. Roberts

Location and Description of Measurement (Receptor Location):

Receptor #1: 5471 Mount Helena Ave, LA, CA 90041
Home South of 134 fwy. on Dead End Street

Approximate Distance from Receptor:

2,389' South of Project Site

Time Measurement Began: 1052 DAY **Time Measurement Ended:** 1107

Data Stored as Recorded #?: 1

Leq:	54.0	dBA	**L90:**	51.5	dBA
MaxP:	89.0	dBC	**L75:**	—	dBA
MinL:	49.1	dBA	**L50:**	53.5	dBA
MaxL:	59.9	dBA	**L25:**	—	dBA
SEL:	83.7	dBA	**L10:**	55.5	dBA
LVN:	—	dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Sunny, Slight breeze, 79°F

Description/sources of ambient noise:

Freeway noise, birds,

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon LA
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10.21.15
Stantec Technician:	S Roberts / K Posekian

Location and Description of Measurement (Receptor Location):

Receptor 1: 5471 Mount Helena Ave, LA 90041
Home South of 134 fwy on Dead End St.

Approximate Distance from Receptor:

2,389' South of Project Site

Time Measurement Began:	22 22 NITE		**Time Measurement Ended:**	2237	
Data Stored as Recorded #?:	7				
Leq:	56.8	dBA	**L90:**	52.5	dBA
MaxP:	92.2	dBC	**L75:**	—	dBA
MinL:	50.5	dBA	**L50:**	55.0	dBA
MaxL:	73.5	dBA	**L25:**	—	dBA
SEL:	86.6	dBA	**L10:**	58.0	dBA
LVN:	—	dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Clear 66°F

Description/sources of ambient noise:

Freeway, local traffic, crickets, siren

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon LA County
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10.21.15
Stantec Technician:	S. Roberts

Location and Description of Measurement (Receptor Location):

Receptor #2: 1233 Cedaredge Ave, LA, CA 90041. Home on the corner of Cedaredge Ave and Blue Hill just South of the 134 fwy

Approximate Distance from Receptor:

3,033' South of project site

Time Measurement Began:	1114	DAY	**Time Measurement Ended:**	1129	
Data Stored as Recorded #?:	2				
Leq:	65.2	dBA	**L90:**	62.0	dBA
MaxP:	94.1	dBC	**L75:**	—	dBA
MinL:	60.1	dBA	**L50:**	64.5	dBA
MaxL:	75.0	dBA	**L25:**	—	dBA
SEL:	94.9	dBA	**L10:**	67.0	dBA
LVN:	—	dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Sunny, Slight breeze 79°F

Description/sources of ambient noise:

Freeway noise,

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon LA COUNTY
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10·21·15
Stantec Technician:	S. Roberts / K. Posekian

Location and Description of Measurement (Receptor Location):

Receptor #2: 1233 Cedaredge Ave, LA, CA. 90041. Home on the Corner of Cedaredge Ave & Blue Hill
Just South of the 134 Fwy.

Approximate Distance from Receptor:

3,033' South of Project Site.

Time Measurement Began:	2243	NITE	**Time Measurement Ended:**	2258	
Data Stored as Recorded #?:	8				
Leq:	64.3	dBA	**L90:**	61.5	dBA
MaxP:	92.5	dBC	**L75:**		dBA
MinL:	59.3	dBA	**L50:**	64.0	dBA
MaxL:	69.0	dBA	**L25:**		dBA
SEL:	94.1	dBA	**L10:**	66.0	dBA
LVN:		dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Clear; 66°F

Description/sources of ambient noise:

Local Traffic, Freeway Noise; Crickets

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon Pasadena
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10-21-15
Stantec Technician:	S. Roberts

Location and Description of Measurement (Receptor Location):

Receptor 3: corner of Patircan & LaMirada

Approximate Distance from Receptor:

2,970 North East of Project Site

Time Measurement Began:	1145 DAY		**Time Measurement Ended:**	1202	
Data Stored as Recorded #?:	3				
Leq:	54.5	dBA	**L90:**	44.0	dBA
MaxP:	93.4	dBC	**L75:**	—	dBA
MinL:	41.5	dBA	**L50:**	48.5	dBA
MaxL:	67.1	dBA	**L25:**	—	dBA
SEL:	84.2	dBA	**L10:**	59.0	dBA
LVN:		dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Sunny, Slight Breeze 78°F

Description/sources of ambient noise:

Freeway, local traffic, trucks hauling in & out of land fill
const. noise, i.e. hand tools, grinder, hammer, etc. (building house)

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon Pasadena
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10·21·15
Stantec Technician:	S. Roberts / K. Poskian

Location and Description of Measurement (Receptor Location):

Receptor 3: Corner of Patrizan & La Mirada

Approximate Distance from Receptor:

2,970 North east of ~~Property~~ project site.

Time Measurement Began:	2315 NITE		**Time Measurement Ended:**	2330	
Data Stored as Recorded #?:	9				
Leq:	47.8	dBA	**L90:**	43.0	dBA
MaxP:	85.8	dBC	**L75:**	—	dBA
MinL:	41.9	dBA	**L50:**	44.0	dBA
MaxL:	64.6	dBA	**L25:**	—	dBA
SEL:	77.5	dBA	**L10:**	45.5	dBA
LVN:		dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Clear; 66°F

Description/sources of ambient noise:

Freeway Traffic; Local Traffic; Crickets; Water Fountain; Helicopter.

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon Pasadena
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10.21.15
Stantec Technician:	S. Roberts

Location and Description of Measurement (Receptor Location):

Receptor 4: 1600 Glen Oaks Blvd, Pasadena, CA 91105

Approximate Distance from Receptor:

2,607' Northeast of Project Site

Time Measurement Began:	1219	DAY	**Time Measurement Ended:**	1234	
Data Stored as Recorded #?:	4				
Leq:	37.1	dBA	**L90:**	34.0	dBA
MaxP:	86.0	dBC	**L75:**	—	dBA
MinL:	32.8	dBA	**L50:**	36.0	dBA
MaxL:	47.0	dBA	**L25:**	—	dBA
SEL:	66.6	dBA	**L10:**	39.0	dBA
LVN:	—	dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Sunny, Slight Breeze 81°F

Description/sources of ambient noise:

Freeway in the distance, birds, frogs

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon Pasadena
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10.21.15
Stantec Technician:	S. Roberts / K. Posekian

Location and Description of Measurement (Receptor Location):

Receptor 4: 1600 Glen Oaks Blvd, Pasadena, CA. 91105

Approximate Distance from Receptor:

2,687' Northeast of Project Site.

Time Measurement Began:	2342 NITE		**Time Measurement Ended:**	2357	
Data Stored as Recorded #?:	10				
Leq:	47.1	dBA	**L90:**	37.0	dBA
MaxP:	94.6	dBC	**L75:**		dBA
MinL:	36.3	dBA	**L50:**	38.5	dBA
MaxL:	67.2	dBA	**L25:**		dBA
SEL:	76.9	dBA	**L10:**	40.0	dBA
LVN:		dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Clear; 66°F;

Description/sources of ambient noise:

Freeway Traffic; Local Traffic; Crickets

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon Glendale
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10.21.15
Stantec Technician:	S. Roberts

Location and Description of Measurement (Receptor Location):

Receptor 5: corner of Figueroa & Marengo Dr., Glendale @ Deadend

Approximate Distance from Receptor:

4,271' North of project site

Time Measurement Began:	13.15 DAY		**Time Measurement Ended:**	1330	
Data Stored as Recorded #?:	5				
Leq:	43.4	dBA	**L90:**	30.5	dBA
MaxP:	86.2	dBC	**L75:**	—	dBA
MinL:	29.1	dBA	**L50:**	34.0	dBA
MaxL:	62.8	dBA	**L25:**	—	dBA
SEL:	73.1	dBA	**L10:**	45.0	dBA
LVN:		dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Sunny, slight breeze 81°F

Description/sources of ambient noise:

quiet neighborhood, helo circling the area. local traffic

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon Glendale
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10.22.15
Stantec Technician:	S. Roberts / K. Posekian

Location and Description of Measurement (Receptor Location):

Receptor 5: Corner of Figueroa & Marengo Dr., Glendale, CA.
@ Deadend

Approximate Distance from Receptor:

4,271' North of Project site.

Time Measurement Began:	2420	NITE	**Time Measurement Ended:**	2435	
Data Stored as Recorded #?:	11				
Leq:	39.1	dBA	**L90:**	36.5	dBA
MaxP:	68.1	dBC	**L75:**		dBA
MinL:	35.1	dBA	**L50:**	38.5	dBA
MaxL:	46.4	dBA	**L25:**		dBA
SEL:	68.9	dBA	**L10:**	40.5	dBA
LVN:		dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Clear; 66°F

Description/sources of ambient noise:

Local Traffic; Crickets; Train.

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon Glendale
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10.21.15
Stantec Technician:	S. Roberts

Location and Description of Measurement (Receptor Location):

Receptor 6: 2840 Glencoaks Canyon Rd, Glendale 91206 next to Park and down hill from Scholl cyn Golf + tennis club and athetic fields.

Approximate Distance from Receptor:

2,281' West of the Project Site

Time Measurement Began:	1417 DAY		**Time Measurement Ended:**	1432	
Data Stored as Recorded #?:	6				
Leq:	46.4	dBA	**L90:**	37.5	dBA
MaxP:	85.4	dBC	**L75:**	—	dBA
MinL:	35.4	dBA	**L50:**	42.5	dBA
MaxL:	63.6	dBA	**L25:**	—	dBA
SEL:	76.0	dBA	**L10:**	48.5	dBA
LVN:	—	dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Sunny. Slight Breeze, 82°F

Description/sources of ambient noise:

birds, heavy trucks/equipment in distance

AMBIENT NOISE MEASUREMENT DATA SHEET

Project Name:	Scholl Canyon Glendale
Project Number:	2057123300
Noise Meter Make and Type:	Bruell & Kjaer Model 2236
Microphone:	Bruel & Kjaer 1/2" Free-field Microphone
Acoustical Calibrator:	Bruel & Kjaer Model 4231
Date of Measurement:	10.22.15
Stantec Technician:	S. Roberts / K. Posekian

Location and Description of Measurement (Receptor Location):

Receptor 6: 2840 Glenoaks Canyon Rd; Glendale 91206. Next to Park & Downhill from Scholl Cyn Golf and Tennis Club and athletic fields

Approximate Distance from Receptor:

2,281' West of Project Site.

Time Measurement Began:	2453	NITE	**Time Measurement Ended:**	0108	
Data Stored as Recorded #?:	12				
Leq:	46.5	dBA	**L90:**	44.5	dBA
MaxP:	75.0	dBC	**L75:**	—	dBA
MinL:	43.5	dBA	**L50:**	45.5	dBA
MaxL:	53.5	dBA	**L25:**	—	dBA
SEL:	76.1	dBA	**L10:**	47.5	dBA
LVN:	—	dBA			

Description of meteorological conditions (weather, wind, temperature, etc.):

Clear

Description/sources of ambient noise:

Crickets; Dog Barking;