



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

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## **Partially Recirculated Draft Environmental Impact Report (PR-Draft EIR) for the Grayson Repowering Project (Proposed Project) (SCH No.: 2016121048)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Glendale (referred to alternatively as “the City”) is the California Environmental Quality Act (CEQA) Lead Agency and in September 2017 put forward a Draft EIR for the original repowering project, which involved removal of 238 megawatts (MW) gross (219 MW net) of existing generation equipment and replacement with approximately 270 MW gross (262 MW net) equipment. The Draft EIR also identified and evaluated five alternatives (Alternatives 1 through 5) to the original repowering project. In April 2018, the Glendale City Council considered a Final EIR for the original repowering project and the five alternatives but did not certify it, instead directing Glendale Department of Water and Power to consider greener alternatives as part of the repowering project<sup>1</sup>. In August 2021, the City released a PR-Draft EIR for public review and comments.

### South Coast AQMD Staff’s Summary of the Project Information in the PR-Draft EIR

Based on the PR-Draft EIR, Alternatives 7 and 8 are new alternatives. Alternative 7 consists of replacement of the existing generation units with exception of the gas turbine Unit 9, which was built in 2003, with five identical reciprocating internal combustion engine (RICE) units producing approximately 93 MW net at average annual site conditions, and a battery energy storage system (BESS) providing 75 MW/300 megawatt-hour (MWH) of power and energy<sup>1</sup>. Alternative 8 consists of refurbishment and retrofitting of existing generation units Unit 8A and Unit 8B/8C and a 75 MW/300 MWH BESS<sup>2</sup>. The generating capability of Alternative 8 is anticipated to total 101 MW<sup>3</sup>. Alternative 6, which was identical to Alternative 7 but had a different layout configuration, is rejected as infeasible due to physical limitations.

South Coast AQMD is a Responsible Agency for the Proposed Project (CEQA Guidelines Section 15381) since implementation of the Proposed Project requires permits from South Coast AQMD. South Coast AQMD received five permit applications [Application Numbers (A/Ns): 621976, 621977, 621978, 621979, and 621980] for each of the RICE units under Alternative 7, and three permit applications (A/Ns: 631261, 631262, and 631263) for refurbishing and

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<sup>1</sup> *Ibid.* Page xxi.

<sup>2</sup> *Ibid.*

<sup>3</sup> Chapter 5 Alternatives Page 5.53.

retrofitting the existing natural gas turbines 8A and 8B/8C under Alternative 8 (South Coast AQMD Facility ID No.: 800327).

#### South Coast AQMD Staff's Comments on the PR-Draft EIR

Based on a review of the PR-Draft EIR and technical appendices, South Coast AQMD staff found that the Lead Agency calculated Alternative 7's criteria pollutants emissions based on an annual schedule of 1,260 total operating hours<sup>4</sup>. The criteria pollutants emissions inventory for Alternative 8 was based on a monthly schedule of 250 operating hours and an annual schedule 1,200 operating hours<sup>5</sup>. The operating schedule is a critical underlying assumption that went into calculating the criteria pollutants emissions for Alternatives 7 and 8. However, no information was provided in the PR-Draft EIR on this underlying assumption, and no mitigation measure or project condition was included in the PR-Draft EIR that would limit the operating hours at the Proposed Project. Because there is a direct nexus between the operating schedule and the amount of criteria pollutants emissions, the Lead Agency should provide additional information in the Final EIR as substantial evidence to support that the operating hours used in the air quality analysis for Alternatives 7 and 8 were appropriate. If it is reasonably foreseeable that Alternatives 7 and 8 could potentially have greater operating hours than those used in the air quality analysis in the PR-Draft EIR, the Lead Agency should re-evaluate the air quality impacts based on the greater operating hours in the Final EIR. It is important to note that the assumptions in the air quality analysis in the Final EIR will be used as the basis for evaluating the permits under CEQA and imposing permit conditions and limits.

#### Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Air Quality Specialist, at [amullins@aqmd.gov](mailto:amullins@aqmd.gov), should you have any questions or wish to discuss the comments.

Sincerely,

*Lijin Sun*

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

RC/LC/CA/LS:AM

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Control Number

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<sup>4</sup> *Ibid.* Appendix C.1 Table B-4. PDF page 483.

<sup>5</sup> *Ibid.* Appendix C.2 PDF pages 597 and 598.