

# THE SMITH FIRM

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South Coast Air Quality Management District  
Mr. Jeffrey Inabinet  
CEQA Section, Planning, Rule Development and Area Sources  
21865 Copley Drive  
Diamond Bar, CA 91765-4178

**RE:** Comments upon Draft Subsequent Environmental Impact Report for the Sunshine Gas Producers Renewable Energy Project, SCH No. 9204153, Sunshine Canyon Landfill

Dear Mr. Inabinet:

I write respectfully to submit the further comments of my client, the North Valley Coalition, on the above-referenced Draft Subsequent Environmental Impact Report. The DSEIR is intended as an analysis of a proposed landfill gas energy project at Sunshine Canyon Landfill near Granada Hills, California.

The EIR is inadequate in several areas. In general it fails to properly evaluate the baseline conditions at the landfill. The stench of landfill gas from the landfill is a horrendous environmental condition for those who live around the landfill, including the members of the North Valley Coalition.

As is known to the Air Quality Management District, landfill gas has generated odors many times that of other landfills, resulting in between 12 and 15 times the odor complaints of other landfills, according to the SCAQMD's December 7, 2011 task force summary. Of all odor complaints received by the AQMD, 20 percent are from the Sunshine Canyon Landfill.

This is not a new situation, but one which AQMD has recognized at least since 2009. Yet, AQMD has accepted a draft environmental impact report for the proposed energy project which ignores this very significant environmental impact. It fails to describe how the proposed project will potentially worsen this already acute condition.

According to AQMD's own experts, the landfill gas fired turbines to be used by the project run only eight hours per day, with less emissions efficiency than the existing flares. Any efforts to bring the impact of odors below the currently significant level will thus be thwarted or delayed by replacing flares with turbines.

Nor does the EIR address that the AQMD issued an amended Abatement Order for Odors on December 3, 2011, now being instituted, which includes among other things: another flare, 70 more wells, new headers and new piping. The EIR fails to analyze the energy projects' effect on these efforts.

The potentially significant adverse environmental impact of the failure to integrate the gas collection with the energy project is well documented in AQMD's own records. Instead of dealing with the real current conditions, the project EIR analyzes as current conditions only those conditions from 2007-2009. DSEIR page 4-3.

The DSEIR discussion of odors at section 4.2.3.8, page 4-26, fails to analyze any of these factors in concluding that the project odor impacts would not be significant.

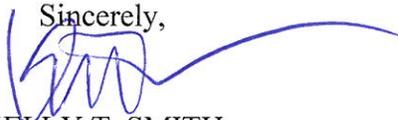
The EIR avoids these issues by stating, at page 3-14: "Landfill gas control and destruction devices are not considered to be a source of odors at landfills." According to the DSEIR then: landfill gas control doesn't create odors, landfills do.

But that is not the point here. The landfill gas odors are indisputably a significant environmental impact. The landfill gas control, existing and planned, was ordered by AQMD to control the impacts. The energy project interferes with that effort by resulting in greater odor.

The Draft Supplemental Environmental Impact Report should be rejected.

Thank you for your attention to this matter.

Sincerely,



KELLY T. SMITH