



January 31, 2008

Glenn Acosta
Los Angeles County Sanitation District
1955 Workman Mill Road
Whittier, CA 90607

Dear Mr. Acosta:

Re. Comments on the Mitigated Negative Declaration, Palos Verdes Gas to Energy Center, Phase II.

The Sierra Club Palos Verdes/South Bay Chapter has concluded its review of the initial study and draft mitigated negative declaration for the Palos Verdes Gas to Energy Facility Phase II and appreciates the opportunity to continue its comments regarding the Project.

The Proposed IS/MND does make some progress towards mitigating the direct environmental impacts of fugitive dust created during the construction portion of the project, however the IS/MND continues to have insufficient discussion and analysis of the Project's long term and cumulative impacts to the environment and community. In addition, the IS/MND continues to lack a sufficient discussion and assessment of the Project's other possible impacts on geology and soils, water quality, noise, and traffic and protective measures preventing the release of hazardous waste.

Based on the IS/MND inadequate discussion of potential impacts of the Project, the Sierra Club maintains its position that a comprehensive environmental impact report, (EIR) is appropriate to fully analyze all potential environmental impacts resulting from the Project.

CEQA notes that if a 'fair argument' exists that a Project may have a significant effect on the environment, an EIR must be prepared. Furthermore under CEQA, the LACSD may not adopt the IS/MND if all potentially significant effects of the Project are not averted or reduced to a level of insignificance as a result of the incorporated mitigation measures.

Based on comments to the Project, the IS/MND does not adequately address all potentially significant impacts raised by the comments in the record. Most notably, the impacts on the schools and residences whose borders are within 1000 feet of the landfill property are not addressed in this document. The cumulative and long-term impacts caused by various types of total landfill emissions are not discussed in the mitigation in the IS/MND. These emissions, which are not adequately addressed in the IS/MND, are of great concern to the Sierra Club.

Since the IS/MND does not adequately evaluate all the potential impacts from the Project, the Sierra Club strongly requests that the LACSD prepare a comprehensive EIR to address the concerns of the community and ensure that this comprehensive review take into account all the potential impacts of the Project including long-term and cumulative impacts.

Sincerely,

Hersh Kelley, Chair
Palos Verdes - South Bay Group
Angeles Chapter, Sierra Club

cc: Senator Dianne Feinstein
Assemblywoman Betty Karnette
Assemblyman Ted Lieu
Rolling Hills Estates City Council
Rancho Palos Verdes City Council
Torrance City Council
Palos Verdes Unified School Board
Torrance Unified School Board