

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Final Program Environmental Assessment for:

Re-adoption of Proposed Rule 1315 – Federal New Source Review Tracking System

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CHAPTER 6

ALTERNATIVES -- DIRECT AND INDIRECT AIR QUALITY, VISIBILITY, AND GREENHOUSE GAS IMPACTS

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INTRODUCTION

This ~~Draft-Final~~ PEA provides a discussion of alternatives to the proposed project as required by CEQA. An EIR must describe a range of reasonable alternatives to the proposed project that would feasibly attain most of the project objectives and provide a means for evaluating the comparative merits of each alternative. A "No Project" alternative must also be evaluated. The range of alternatives must be sufficient to permit a reasoned choice, but need not include every conceivable project alternative. State CEQA Guidelines §15126.6(a) states that there is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. The key issue is whether the selection and discussion of alternatives fosters informed decision making and meaningful public participation.

SCAQMD Rule 110 (the rule that implements the SCAQMD's certified regulatory program) does not impose any greater requirements for a discussion of project alternatives in an environmental assessment than is required for an EIR under CEQA. To provide an analysis of impacts from the alternatives consistent with the analysis of impacts from the proposed project, the analysis of air quality, health, visibility, and greenhouse gas emission impacts from the project alternatives is included in this chapter (see Subchapter 4.1 of this PEA for the analysis of these same impacts from the proposed project). The analysis of most indirect impacts from the project alternatives can be found in Chapter 7 of this PEA (see subchapters in Chapter 5 of this PEA for the analysis of indirect impacts from the proposed project). This format approach makes it easier for the reader to compare all environmental effects of the project alternatives with all environmental effects of the proposed project.

ALTERNATIVES REJECTED AS INFEASIBLE

A CEQA document should identify any alternatives that were considered by the lead agency, but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination (CEQA Guidelines §15126.6(c)). While the scope and goals of proposed projects may be relatively specific, a variety of options can be considered as alternatives to the proposed project. Because of the variety of alternative options to the proposed project, there is a wide range of alternatives that have been considered and evaluated in this chapter. The following alternatives have been eliminated from further detailed consideration in the PEA for the following reasons: 1) they fail to meet most of the basic project objectives, 2) they are infeasible as defined by CEQA (CEQA Guidelines §15364), or 3) they are unable to avoid significant impacts (CEQA Guidelines §15126.6(c)).

Prohibit the Use of Offsets from Shutdowns or Reductions at Minor Sources to Demonstrate Equivalency with Federal Offset Requirements

One theoretically possible alternative would be to prohibit the use of newly tracked minor source credits for demonstrating equivalency with federal offset requirements. Under such an alternative, newly tracked minor source credits could not be used as offsets for emissions from sources eligible for the offset exemptions in Rule 1309.1 or Rule 1304. This alternative is not consistent with the project objectives identified in Chapter 2 to: 1) maintain the ability of the SCAQMD to continue to administer its new source review program for major and minor sources for facility modernization and to accommodate population growth; and 2) recognize sufficient previously-unused emission reductions beyond those required by applicable regulatory requirements in order to demonstrate federal equivalency for major sources that are exempt under Rule 1304 or that obtain credits from the Priority Reserve under Rule 1309.1. Removing all credits from shutdowns or reductions at minor sources would cause the internal offset accounts for CO and PM10 to start with negative balances and would change the 2006 balances as shown in Table 6-1.

TABLE 6-1
Year 2006 Running Balance Without Minor Source
Credits (Tons/Day)

	Pollutant				
	VOC	NO _x	SO _x	CO	PM ₁₀
2006 Running Balance with Minor Source Credits	68.80	26.65	2.46	13.35	11.41
2006 Running Balance without Minor Source Credits	19.72	11.26	0.43	-3.39	-3.27
Net Change in 2006 Running Balance if Minor Source Credits Removed	-49.08	-15.39	-2.03	-16.74	-14.68

Under this alternative, no permits could be issued under Rules 1304 or 1309.1 for a source that would have an increase in PM10 emissions, which typically covers most types of combustion sources and many non-combustion sources. This would result in a permit moratorium for projects resulting in a PM10 emission increase until enough existing sources shut down or have other surplus PM10 emission reductions to restore a positive PM10 SCAQMD internal offset account balance for use in the following year. It is expected that it would take several years to obtain sufficient emission reductions to provide a positive balance of PM10 offsets.

Prohibit the Use of Any Credits Not Previously Recognized Prior to Adoption of Rule

This potential alternative would re-establish the internal offset tracking system that was in place prior to adopting the 2006 or 2007 versions of proposed Rule 1315. Under this

alternative, only the sources of credits accounted for under the prior offset tracking system would be recognized for purposes of demonstrating equivalency with federal offset requirements.

Prior to these earlier adoptions of proposed Rule 1315, in connection with review of a separate rule adopted in 2002, USEPA questioned whether the SCAQMD had retained adequate documentation of certain emissions reductions that arose from shutdowns occurring before 1990. As a result, SCAQMD agreed to remove those pre-1990 credits for which the District no longer possessed complete documentation.

Absent either the pre-1990 credits or the new sources of credits that would be recognized under proposed Rule 1315, SCAQMD's internal accounts would have negative balances for some pollutants. As a result, SCAQMD would not be able to demonstrate equivalency with federal offset requirements.

Table 6-2 summarizes the 2006 balances for this alternative excluding the pre-1990 credits without sufficient records and excluding BACT discount of ERCs.

TABLE 6-2
Year 2006 Running Balance with Pre-September 2006
Tracking System (Tons/Day)

	Pollutant				
	VOC	NOx	SOx	CO	PM10
2006 Running Balance with Proposed Tracking System	68.8	26.65	2.46	13.35	11.41
2006 Running Balance with pre-September 2006 Tracking System (approvable version)	18.37	10.77	0.36	-5.09	-4.45
Net Change in 2006 Running Balance if Reinstate Pre-September 2006 Tracking System	-50.43	-15.88	-2.1	-18.44	-15.86

Under this alternative, no permits could be issued under Rules 1304 or 1309.1 for a source that would have an increase in PM10 emissions, which typically covers most types of combustion sources and many non-combustion sources. This would result in a permit moratorium for projects resulting in a PM10 emission increase until enough existing sources shut down or have other surplus PM10 emission reductions to restore a positive PM10 SCAQMD internal offset account balance for use in the following year. It is expected that it would take several years to obtain sufficient emission reductions to provide a positive balance of PM10 offsets.

Fossil Fueled Power Plant Project Alternative

Environmental groups and power plant representatives suggested at the April 8, 2009, Public Consultation and Scoping Meeting for the proposed project that the SCAQMD

consider an alternative of evaluating the impacts from allowing fossil fueled power plant projects access to the SCAQMD's internal offset accounts. Such an alternative would be similar to the 2007 amendments to Rule 1309.1 vacated by the Superior Court. This alternative would allow fossil fueled power plants access to the SCAQMD's offset accounts for applications deemed complete during a specified period of time (e.g., a period of three years) and require payment of mitigation fees to fund future clean air projects.

In part, the rationale expressed by environmental groups and power plant representatives for this alternative was the concern that the Governing Board may adopt Rule 1315, but may not adopt the proposed amendments then contemplated for Rule 1309.2. At the time the NOP/IS was circulated for public review, the proposed project included amending Rule 1309.2 to exclude larger fossil fuel-fired thermal power plants from accessing the SCAQMD's internal offset accounts. Subsequent to the release of the NOP/IS, the SCAQMD decided to remove the amendment to Rule 1309.2 from the project description and rescind Rule 1309.2 in its entirety. Rule 1309.2 was rescinded by the SCAQMD Governing Board on February 5, 2010. This means that power plant projects that do not currently qualify for exemption under Rule 1304 as involving source modifications or as less-than four-ton facilities are not eligible under SCAQMD rules for credits from SCAQMD's internal offset accounts. An alternative that would allow power plants access to the SCAQMD internal accounts would not lessen any significant environmental impacts resulting from the proposed project and, therefore, does not meet CEQA's requirement to avoid or lessen any of the significant effects of the project (CEQA Guidelines §15126.6(a)).

Power plants, however, are not ignored in the analysis. In October 2009, Governor Schwarzenegger signed into law AB 1318, which requires that qualified electrical generating facilities be provided with offsets from the SCAQMD's internal accounts (Health & Safety Code § 40440.14). The CPV Sentinel Energy project meets these requirements. Also, there is proposed legislation that could provide access to the SCAQMD's internal accounts for one additional power plant, the Walnut Creek Mission Energy project. A third power plant – NRG's El Segundo Power Redevelopment project – was anticipated to be the subject of legislation mirroring the Walnut Creek Energy Park and CPV Sentinel Energy projects. More recently, the El Segundo plant has received an exemption from the offset requirements under Rule 1304(a)(2). Therefore, the El Segundo power plant received its permit pursuant to SB 827, which authorizes the District to issue permits under Rules 1304 and 1309.1 through May 1, 2012. To the extent the three power plants obtain permits pursuant to State Legislation, including SB 827, rather than by proposed Rule 1315, these three power plants are not permitted pursuant to the proposed project; however, they are considered reasonably foreseeable projects contributing to cumulative impacts. Therefore, impacts from the three proposed power plants are discussed as part of the cumulative scenario.

Other Project Alternatives Suggested by the Superior Court

In its decision in *Natural Resources Defense Council v. South Coast Air Quality Management District* (Los Angeles County Superior Court Case No. BS 105728), the Superior Court suggested several alternatives based upon potential SCAQMD energy-related objectives identified for the previously proposed amendments to Rule 1309.1, which would have provided power plants with access to the Priority Reserve for a specified period. The Court stated, “If the District’s environmental objective is to eliminate reliance on diesel-powered back-up generators, then one possible mitigation measure would be to limit access to the Priority Reserve to those power companies wanting to replace dirty power generators with newer, cleaner generating plants. . . . Or, if the problem is a statewide shortage of electricity, . . . then the alternative of siting that capacity in areas with cleaner air and transporting it into the basin via additional transmission capacity is an alternative that should be considered. Or, if the problem is with peak power, the question remains whether that limited, incremental power can be provided using solar, wind, or other renewable facilities.”

The proposed project no longer includes provisions that would make power plants eligible for offsets from the SCAQMD’s internal accounts, except for the source modifications and less than four-ton facilities that have been eligible for exemptions from offsets pursuant to Rule 1304, or landfill gas control systems eligible under Rule 1309.1, since 1996. Because the proposed project does not attempt to address the needs for additional or cleaner power, an alternative that would only make credits available to cleaner plants, renewable power, or power plants outside the district would not address the project objectives for the currently proposed project.

Issue Offsets to Priority Projects First

This alternative would require establishing a list of stationary source projects from the highest to lowest priority according to whether or not they are environmentally and/or economically beneficial. Examples of high priority projects may include projects using clean or alternative fuels or projects using super compliant solvent products. Once the priority list is established, projects with the highest priority ratings would be awarded offsets first; projects with a lower priority rating would be awarded offsets only after offsets have been awarded to higher priority projects.

There are a number of hurdles to implementing this alternative. First, applications for new or modified sources are considered and addressed on a “first in, first out” basis. As a result, it would be difficult, if not impossible, to administer a priority projects alternative effectively. An application for a low priority project may be processed and approved before a permit application for a higher priority project is received. To award offsets on a priority basis would likely necessitate a lengthy delay period so that proposed projects could first be collected and ranked before applications could be granted. This would result in delays in processing both higher and lower priority projects.

Ultimately, this alternative would be expected to generate direct and indirect environmental impacts equivalent to the proposed project because similar assumptions regarding the amount and rate of use of offsets in the internal accounts would apply to this alternative as would apply to the proposed project. As a result, this alternative is not carried forward because it would not be expected to avoid or substantially lessen significant impacts from the proposed project (CEQA Guidelines §15126.6(a)).

DESCRIPTION OF PROJECT ALTERNATIVES

The following project alternatives were generally developed by modifying specific components of the Proposed Rule 1315. In addition, Alternative C addresses comments stating concerns that credits should be limited to small businesses and Alternative D addresses comments stating concerns that previous minor source shutdown credits should not be used for future permitted projects. The rationale for selecting and modifying specific components of the proposed project to generate feasible alternatives for the analysis is based on CEQA's requirement to present "potentially feasible" alternatives. When considering approval of the proposed project, the SCAQMD's Governing Board may choose all of or portions of any of the alternatives analyzed, as well as variations on the alternatives, since the comparative merits of the project alternatives have been analyzed and circulated for public review and comment along with the analysis of the proposed project. The main components of the proposed project and each project alternative are summarized in Table 6-3.

Summary of the Proposed Project

Before describing each of the five project alternatives, this section provides a brief summary of the proposed project. As described in Chapter 2 (Project Description), proposed Rule 1315 would ensure that emissions increases from exempt sources under Rule 1304 and sources accessing the SCAQMD's Priority Reserve account under Rule 1309.1 are fully offset to the extent required by federal law by valid emission reductions from the SCAQMD's internal offset accounts. The proposed rule would achieve equivalency with federal requirements by establishing what types of reductions are eligible to be used to offset emissions from major sources and how those reductions are tracked. The proposed rule would also provide for the use of offsets from certain newly tracked sources. For example, under proposed Rule 1315 SCAQMD would recognize emission reductions generated from federal minor source shutdowns and reductions that were not previously accounted for in the SCAQMD's federal equivalency demonstrations.

TABLE 6-3
Comparison of Key Components of the Proposed Project to the Alternatives

Proposed Project (Key Components)	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limit Offset Availability
<i>Project Description Summaries</i>					
PR 1315 would specify the tracking system used to demonstrate equivalency with federal offset requirements. It would track offset use and establish caps on net emissions increases from issuance of permits under Rules 1304 and 1309.1 based on 2007 AQMP growth projections for applicable industry categories.	Neither the proposed project nor Alternatives B through D adopted. SB827 would allow issuance of permits under Rules 1309.1 and 1304 from January 1, 2010 until May 1, 2012, at which time permits would not be issued under Rules 1309.1 or 1304. AB 1318 and pending SB 388 could allow credits transferred to qualifying power plants until 5/1/12 and 1/1/13, respectively.	Would specify the tracking system to demonstrate equivalency with federal offset requirements. Offsets subject to fees for large businesses that qualify for permits under Rule 1304. Fees would be used for emission reduction projects. Otherwise, includes same components including caps on net emission increases. Mitigation projects could not create new offsets.	Would establish a tracking system to demonstrate equivalency with federal offset requirements. Large businesses would be prohibited from accessing the SCAQMD's internal offset accounts. Otherwise, includes same components as proposed project, including caps on net emission increases.	Would establish a tracking system to demonstrate equivalency with federal offset requirements. Would eliminate the SCAQMD's existing internal account balances. SCAQMD's internal accounts would only be funded by credits generated starting in 2009. Otherwise, includes same components as proposed project, including caps on net emission increases.	Would specify the tracking system to demonstrate equivalency with federal offset requirements. Would establish caps on net emission increases established at 50% of the 2007 AQMP growth projections for the applicable industry categories. Otherwise, includes same components as proposed project.
<i>Purpose (Subdivision a)</i>					
Maintain ability to continue to issue permits to major and minor sources for facility modernization and to accommodate population growth (implement Rules 1304 and 1309.1), memorialize procedures for demonstrating equivalency; & demonstrate sufficient credits available to demonstrate equivalency.	Rule 1315 not adopted, so sources could not obtain offsets from Rules 1309.1 or 1304 after May 1, 2012. SCAQMD would not maintain internal accounts.	Same as proposed project.	Same as proposed project. However, large businesses would no longer qualify for offset exemptions pursuant to Rule 1304.	Same as proposed project. However, only offsets generated from the year 2009 on could be used.	Same as proposed project.

TABLE 6-3 (Continued)

Comparison of Key Components of the Proposed Project to the Alternatives

Proposed Project Key Components	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
<i>Definitions Subdivision b)</i>					
Community Bank Net Emission Increase Offset Ratio Orphan Reduction Orphan Shutdown Priority Reserve Shortfall	Rule 1315 not adopted so no definitions	Same as proposed project, plus: Large Business	Same as proposed project, plus: Large Business	Same as proposed project.	Same as proposed project.
<i>Federal NSR Equivalency (Subdivision c)</i>					
Maintain a separate District offset account for each federal nonattainment air contaminant	Rule 1315 not adopted so no tracking of federal offset accounts.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.
Annually track all emissions offsets provided to major sources from internal offset accounts.	Rule 1315 not adopted so no tracking of federal offset accounts.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.
Annually track all eligible credits deposited in SCAQMD's internal accounts	No annual tracking because equivalency demonstration with federal offset requirements not necessary as SCAQMD would not provide offsets pursuant to Rules 1304 and 1309.1 and would not maintain internal accounts.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.

TABLE 6-3 (Continued)

Comparison of Key Components of the Proposed Project to the Alternatives

Proposed Project Key Components	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
Deposit appropriate emission reductions in SCAQMD's internal offset accounts.	Emission reductions no longer deposited into SCAQMD's internal offset accounts	Same as proposed project.	Same as proposed project.	Eliminate credits in existing internal offset accounts. Only deposit credits from major and minor sources generated after 2009.	Same as proposed project.
All unused credits in the federal offset accounts shall be discounted annually.	No tracking of federal offset accounts.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.
<i>Net Emission Increases (Subdivision d)</i>					
All increases in potential to emit (PTE) that occur at minor sources pursuant to Rule 1304 and Rule 1309.1 shall be tracked and not constitute debits	Tracking increases in PTE not necessary.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.
Cumulative net emission increases shall be included in the Executive Officer's report to the Governing Board	No Report to the Governing Board required.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.

TABLE 6-3 (Continued)

Comparison of Key Components of the Proposed Project to the Alternatives

Proposed Project Key Components	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
<i>Federal NSR Equivalency Reports (Subdivision e)</i>					
The Executive Officer shall aggregate and track offsets debited from and offsets provided to the SCAQMD offset accounts into specific reporting periods	No offsets from or credits to SCAQMD offset accounts and no reporting periods.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.
Complete Preliminary Determination of Equivalency (PDE) with federal non-attainment NSR offset requirements 12 months after reporting period.	PDE is not required.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.
Complete Final Determination of Equivalency (FDE) with federal non-attainment NSR offset requirements for any account(s) for which the PDE did not demonstrate equivalence with 18 months after reporting period.	FDE is not required.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.

TABLE 6-3 (Continued)

Comparison of Key Components of the Proposed Project to the Alternatives

Proposed Project Key Components	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
<i>Projections of Federal Offset Balances (Subdivision f)</i>					
PDEs & FDEs shall also include projections of the federal offset account balances at the end of each of the two subsequent reporting periods.	PDE and FDE are not required.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.
<i>Equivalency Backstop Provisions (subdivision g)</i>					
Discontinue funding the Priority Reserve if the most recent actual District offset account balances (from FDE) demonstrate a shortfall for any air contaminant.	Internal accounts no longer used so no shortfalls will occur.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.
Resume funding upon completion of FDE demonstrating no more shortfalls.	Internal accounts no longer used so no FDE required to demonstrate no shortfall.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.
Discontinue issuing permits that rely on 1304 or 1309.1 for the air pollutants that have a shortfall.	Internal accounts no longer used so no more shortfalls.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.

TABLE 6-3 (Continued)

Comparison of Key Components of the Proposed Project to the Alternatives

Proposed Project Key Components	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
If an FDE demonstrates that a shortfall exists in any of the SCAQMD offset accounts or a subdivision (f) projection predicts a shortfall, the Executive Officer shall prepare a report to the Governing Board recommending implementation of one or more backstop provisions as needed to correct the shortfall	No FDE required.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.
<i>CEQA Backstop Provisions (subdivision h)</i>					
If the cumulative net emission increase of a nonattainment air contaminant exceeds the cap for that air contaminant, the Executive Officer shall discontinue issuing permits to construct and permits to operate that rely on new offsets from SCAQMD's internal accounts.	No internal accounts, therefore, no cumulative net increases from affected facilities.	Same as proposed project	Same as proposed project	Same as proposed project.	Same as proposed project.

TABLE 6-3 (Continued)
Comparison of Key Components of the Proposed Project to the Alternatives

Proposed Project Key Components	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
Pollutant-specific cumulative net emission increase thresholds are established based on the 2007 AQMP-forecasted growth in emissions from industry categories potentially eligible to receive permits under Rules 1304 and 1309.1	No air contaminant-specific cumulative net emission increase thresholds established	Same as proposed project.	Same as proposed project.	Same as proposed project.	Pollutant-specific cumulative net emission increase thresholds are established based on 50% of the 2007 AQMP-forecasted growth in emissions from industry categories potentially eligible to receive permits under Rules 1304 and 1309.1
State Implementation Plan Submittals (subdivision i)					
Net emission increase definition, cumulative net emission increases & projected cumulative net emission increases, as well as, Rule 1315 requirements for net emissions increases and CEQA backstop provisions shall not be submitted for inclusion in the SIP.	No backstop provisions.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.
Alternatives Components					
Cumulative net emissions increases capped at 2007 AQMP growth projections for industry categories potentially eligible to receive permits under Rules 1304 and 1309.1.	No debits available.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project except caps at 50 % of 2007 AQMP growth projections for industry categories potentially eligible to receive permits under Rules 1304 and 1309.1.

TABLE 6-3 (Concluded)
Comparison of Key Components of the Proposed Project to the Alternatives

Proposed Project Key Components	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
All credits generated each year available as offsets in the future	No credits available.	Same as proposed project.	Same as proposed project.	Existing balances in offset accounts eliminated. Only credits generated from 2009 on could be used as offsets in the future.	Same as proposed project.
Large businesses have access to offsets in the SCAQMD's offset accounts (no change from pre-Rule 1315 situation).	No offset accounts available to any businesses.	Large businesses must pay a fee to access the SCAQMD's offset accounts to qualify for Rule 1304 exemptions.	Large businesses prohibited from access to Rule 1304 exemption from offsets, therefore, offsets unavailable for these sources.	Same as proposed project.	Same as proposed project.
No Fees for large businesses.	No fees.	Includes large business user fee for access to Rule 1304 exemptions; fees to be used for emission reduction projects.	No large business user fees as large businesses would not qualify for exemptions under Rule 1304.	Same as proposed project.	Same as proposed project.
<i>Proposed Amended Rule 1309.2 – No Longer Part of the Proposed Project, Rescinded February 5, 2010</i>					

Proposed Rule 1315 would specify procedures to be followed by the Executive Officer to make annual demonstrations that the SCAQMD's NSR program, in the aggregate, satisfies federal offset requirements for major sources under Clean Air Act §173. SCAQMD Rule 1304 exempts certain types of new or modified sources from NSR offset requirements. Emission increases over applicable thresholds from these exempt new or modified sources are still subject to federal offset requirements pursuant to the Clean Air Act (CAA). Additionally, specific essential public services may obtain offsets from the SCAQMD's Priority Reserve pursuant to SCAQMD Rule 1309.1. Proposed Rule 1315 would continue to ensure that the SCAQMD's NSR program is equivalent in the aggregate to the federal nonattainment NSR offset requirements under the CAA, even after the removal from the SCAQMD's offset accounts of certain pre-1990 credits pursuant to a 2006 agreement with the USEPA.

Alternative A - No Project Alternative

CEQA Guidelines §15126.6 requires evaluation of a no project alternative to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted. However, without the proposed project SB 827 would remain in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. Further, AB 1318, which requires the SCAQMD to provide offsets for power plants that meet specific criteria, would also remain in effect. There is currently pending legislation, SB 388 that would require, upon making specific findings, the SCAQMD to transfer offsets to a second eligible power plant. Emissions from facilities permitted under SB 827, AB 1318 and SB 388 are not due to the proposed project, nor are they the result of a No Project Alternative.

While SB 827 would continue to be in effect through May 1, 2012, the quantitative analysis of the No Project Alternative's air quality, visibility, and greenhouse gas impacts is based upon the assumption that no permits are issued pursuant to the proposed project (proposed rule 1315) after July 1, 2010. This is because, to analyze the project impacts, all emissions resulting from issuance of permits under Rules 1304 and 1309.1 commencing on the earliest potential date of project approval have been attributed to the proposed project.

It was originally assumed that proposed Rule 1315 could be adopted as soon as July, 2010. Because the analysis of environmental impacts from the proposed project has taken longer than anticipated, Proposed Rule 1315 was not adopted in July 2010. In spite of the delay in the anticipated adoption of Proposed Rule 1315, SCAQMD has continued to use the same assumptions regarding emission impacts from affected facilities, i.e., all permits issued after July 1, 2010, are a result of the proposed project

(or alternatives). It is impossible to predict the exact date upon which Proposed Rule 1315 will be considered for adoption. If the time period analyzed in the PEA were modified to reflect approval of Proposed Rule 1315 at a later date, emissions attributed to the project would decrease slightly.

General Effects of Alternative A

As a result of selecting Alternative A, for purposes of analyzing quality, health, visibility and greenhouse gas impacts, it is assumed that no permits would be issued under Rules 1304 and 1309.1 pursuant to proposed Rule 1315. It is possible that existing facilities could increase operations to slightly less than their maximum Potential to Emit (PTE) to help accommodate future population and economic growth. Currently facilities operate, on average, at approximately 80 percent PTEs, depending on market conditions. To accommodate future population growth, existing facilities might increase operations slightly. Therefore, emissions in the district could increase to a certain extent, but would not increase appreciably compared to the proposed project. Such potential emissions increases have not been quantified.

Adoption of Alternative A, the No Project Alternative, would mean that offsets from the district's internal accounts would not be available to facilities providing essential public services. These essential public services include prisons, police facilities, fire fighting facilities, schools, hospitals, water delivery operations, public transit, publicly owned or operated sewage treatment facilities, and landfill gas control or processing facilities. It is expected that few, if any, such facilities would be able to purchase credits on the open market. As a result, development of new and expanded facilities needed to improve essential public services and to serve population growth would be significantly hampered.

In addition, commercial and industrial manufacturing capacity in the district would be limited because the types of facilities that could obtain offsets pursuant to Rules 1304 or 1309.1 under the proposed project would no longer have access to these sources of offsets. As a result, such facilities would have to purchase credits, if available, on the open market. Because credits may be unavailable or too expensive to afford, future affected facilities would likely not be built or could not be modified. This would limit the number of future new jobs because fewer new or modified facilities could be built compared to a scenario where offsets from the SCAQMD's offset accounts are available. Under this scenario, as facilities shut down, consumers may have to drive longer distances to obtain goods and services from facilities that are able to continue operating. In addition, in-district manufacturing capacity may not be able to accommodate future population growth in the district as old facilities would no longer be able to upgrade or replace existing equipment. Under this scenario, a greater proportion of commercial and industrial goods may have to be imported into the district resulting in higher mobile source (e.g., trucks, planes, marine vessels, etc.) emissions than would otherwise be the case. Just as mobile source emissions from the proposed project cannot be quantified,

such potential emissions increases from the No Project Alternative also cannot be quantified.

Alternative B – Offset User Fees for Large Businesses

Alternative B is similar to the proposed project in all aspects except that Alternative B includes “offset user fees” for large businesses that seek an exemption from offset requirements pursuant to Rule 1304. Large businesses that would have to pay an offset user fee are those businesses that do not qualify as small businesses pursuant to the definition of small business in SCAQMD Rule 102 – Definition of Terms (Small Business Assistance Office definition). A small business is defined in Rule 102 as:

For the purpose of qualifying for assistance offered by the SCAQMD’s Small Business Assistance Office only, a small business means a business with total gross annual receipts of \$5,000,000 or less, or a business with a total number of employees of 100 or less.

The intent of this Alternative would be to charge fees for large businesses using the “small facility” exemption (Rule 1304(d), but not for equipment replacement or air pollution control projects. In addition, offset user fees would not be applicable to facilities, including large businesses, seeking offsets through the Priority Reserve pursuant to Rule 1309.1, since these are essential public services and other high-priority sources. Access to Rule 1309.1 would continue to be limited to essential public services, which are defined in Rule 1302 – Definitions, and other Specific Priority Sources. Table 6-4 shows potential offset user fees that could be charged under Alternative B. CO is not included in the list of pollutants for which fees would be paid as the district has been reclassified as attainment for the national ambient air quality standards and, therefore, offsets are not required. Offset user fees would be in effect upon the date of adoption of Alternative B.

TABLE 6-4
Alternative B – Large Business User Fees per Pound of Pollutant

Pollutant^a	Weighted Average Purchase Price^b	Weighted Average Purchase Price Plus 25% Premium^c
NOx	\$61,762.71	\$77,203
PM10	\$116,449.82	\$145,562
VOC	\$9,735.79	\$12,170
SOx	\$48,838.60	\$61,048

^a The district is in attainment with state and federal CO standards, so CO emission increases are no longer subject to offset requirements.

^b Based on weighted average of 2007 and 2008 ERC purchase prices.

^c Premium based on administrative cost and to ensure last resort option.

Large business user fees were derived as follows. SCAQMD staff tracked the number of ERC purchases by pollutant from 2007 through 2008, as well as the purchase price per ERC purchase transaction. Dividing the total dollar amounts of all pollutants purchased by the total number of ERCs purchased by pollutant, produces a weighted average purchase price (middle column of Table 6-4). SCAQMD staff then added a premium of 25 percent of the weighted average purchase price. The 25 percent premium is intended to cover costs to administer the fee program under Alternative B plus an additional cost to dissuade large businesses from obtaining offsets from the SCAQMD's internal offset accounts, except as a last resort. In all other respects, Alternative B would include the same provisions as the proposed project.

General Effects of Alternative B

Under Alternative B, it is assumed that offsets would be debited from the SCAQMD's offset accounts to demonstrate equivalency with federal offset requirements for large businesses. Further, it is conservatively assumed that, regardless of the cost, large businesses would continue to seek exemptions pursuant to Rule 1304 and the SCAQMD would continue to debit its offset accounts in the same amount, on average, as it has in the past, except if limited by the growth caps based on 2007 AQMP growth projections for industry categories potentially eligible to receive permits under Rules 1304 and 1309.1. In general, Alternative B would generate similar air quality, health, visibility, and greenhouse gas impacts compared to the proposed project. However, those impacts would be reduced by implementation of emissions reductions projects funded through the offset fees charged to large businesses.

Under Alternative B, large business would have to pay the large business user fees (Table 6-4) for all emissions offsets obtained from the SCAQMD offset accounts pursuant to the offset exemption provisions of Rule 1304. Table 6-5 provides data on average emissions from large businesses based on historical permitting data between 2001 through 2006. Future emissions from large businesses were calculated for the

future milestone years using 2007 AQMP growth projections. Using the historical emissions data to project future emissions from large businesses for each milestone year and applying the large business user fees per pollutant (Table 6-4), total fees that would be collected for each milestone year in the future as a result of implementing Alternative B are calculated (Table 6-6).

TABLE 6-5
Future Projected Large Business Emissions (tons per day)

Milestone Years	Pollutant			
	VOC	NO _x	SO _x	PM ₁₀
2014	1.39	0.12	0.03	0.09
2023	4.55	0.31	0.09	0.31
2030	6.97	0.52	0.15	0.48
Percent Contribution ^a	24%	23%	21%	11%

^a The average percentage of credits issued to large businesses out of the total average requested credits by R1304 & R1309.1 facilities over the last five years.

The user fees shown in Table 6-6 represent total fees for each milestone period. The total user fees are the sums of the fees collected each year from future new or modified large businesses for each milestone year period.

TABLE 6-6
Potential Large Business User Fees Collected per Pollutant^a

Milestone Year	Fees Collected by Pollutant				
	VOC	NO _x	SO _x	PM ₁₀	TOTAL
2014	\$33,832,600	\$18,528,720	\$3,662,880	\$26,201,160	\$82,225,360
2023	\$110,747,000	\$47,865,860	\$10,988,640	\$90,248,440	\$259,849,940
2030	\$169,649,800	\$80,291,120	\$18,314,400	\$139,739,520	\$407,994,840

^a Total fee = large business emissions (ton/day) x 2000 (pounds/ton) x user fee (dollars/pound). Sums may not be exact due to rounding.

The large business user fees would allow large business operators to continue to qualify for exemptions from offset requirements pursuant to Rule 1304. The SCAQMD would continue to use offsets from its offset accounts to demonstrate equivalency with federal offset requirements for these large businesses. The total user fees collected during each milestone year represent the sums of user fees collected each year during the milestone year periods. This means that user fees would be collected each year in amounts represented by historical permitting data between 2001 through 2006 for large businesses that have qualified for exemptions from offsets pursuant to Rule 1304.

Emission reductions obtained from projects funded by the user fees under Alternative B are based on BACT incremental cost effectiveness and are adjusted to 2010 dollars for the purposes of this analysis. BACT incremental cost effectiveness is intended to determine potential emission reductions from stationary source equipment. BACT cost effectiveness often changes over time based on the introduction of new technologies, or remaining availability of cost-effective reduction opportunities. As a result, it is possible that future cost effectiveness could change over time for the reasons given in the preceding sentence or based on the types of emission reduction projects funded, e.g., mobile source projects rather than stationary source projects. However, it is not known and cannot be known at this time the precise nature of any future emission reduction projects and how the cost effectiveness of these future projects may change, i.e., increase or decrease. It should be noted that if the future emission reduction projects have higher costs than the current BACT increment cost, they will yield less emissions reduction benefits than analyzed. Recent mobile source reduction projects for PM10 have shown to have higher costs than the BACT incremental cost.

Once collected, user fees could be applied to both stationary and mobile source emission reduction projects (such as those identified in Table 6-7, see also Table 7-6 in Chapter 7 of this PEA). In some cases emission reduction projects would likely provide co-benefits by reducing multiple criteria pollutants that would not be subject to the user fee, such as reductions in air toxics and greenhouse gases. Examples of emission reduction projects that could be funded by offset user fees and the incremental cost between existing equipment and new cleaner technologies are shown in Table 6-7 and are based on an evaluation of potentially available projects by SCAQMD's Technology Advancement Office.

TABLE 6-7
Sample Super Clean Air Action Technologies and Incremental Costs

Incremental Cost between Existing Equipment and New Cleaner Technology	Existing Equipment	New Cleaner Technology	Resource
\$2,250 / kW	30 kW – 250 kW Microturbines	1 kW – 250 kW Fuel Cell	Northern Power Systems, 2003
\$4,000 / kW	50 kW – 2 MW Natural Gas ICE	1 kW – 250 kW Fuel Cell	Northern Power Systems, 2003
\$6,000	Perc Dry Cleaning Machine (low end)	Wet Cleaning Machine (high end)	PAR 1421 Staff Report, SCAQMD, Nov. 2002
\$8,450	195 HP Diesel Yard Spotter	LPG Yard Spotter	Carl Moyer Program (FY 2001-2002)
\$9,000	Heavy-Duty Diesel Vehicles (School Buses, Transit Buses, Trash Trucks, etc.) with no control	Heavy-Duty Diesel Vehicle with Particulate Trap (\$6,500) and Catalytic Oxidizer (\$2,500)	Technology Advancement Office,

TABLE 6-7 (CONCLUDED)
Sample Super Clean Air Action Technologies and Incremental Costs

Incremental Cost between Existing Equipment and New Cleaner Technology	Existing Equipment	New Cleaner Technology	Resource
\$10,000	Perc Dry Cleaning Machine (low end)	HC Dry Cleaning Machine (low end)	PAR 1421 Staff Report, SCAQMD, Nov. 2002
\$10,010	250 HP Diesel Paratransit Bus	CNG Paratransit Bus	Carl Moyer Program (FY 2001-2002)
\$15,000	175 HP Diesel Shuttle Bus	CNG Shuttle Bus	Carl Moyer Program (FY 2001-2002)
\$18,140	275 HP Diesel Shuttle Bus	LPG Shuttle Bus	Carl Moyer Program (FY 2001-2002)
\$18,467	80 HP Diesel Sweeper (aux)	CNG Sweeper (aux)	Carl Moyer Program (FY 2001-2002)
\$18,500	235 HP Diesel Maintenance Truck	CNG Maintenance Truck	Carl Moyer Program (FY 2001-2002)
\$20,316	80 HP Diesel Sweeper (aux)	CNG Sweeper (aux)	Carl Moyer Program (FY 2001-2002)
\$33,000	315 HP Diesel Refuse Hauler Stop and Go (automated)	LNG Refuse Hauler Stop and Go (automated)	Carl Moyer Program (FY 2001-2002)
\$36,471	410 HP Diesel Local Delivery Truck	LNG Local Delivery Truck	Carl Moyer Program (FY 2001-2002)
\$36,933	195 HP Diesel Sweeper (main)	CNG Sweeper (main)	Carl Moyer Program (FY 2001-2002)
\$37,000	225 HP Diesel Refuse Hauler Stop and Go (roll-off)	CNG Refuse Hauler Stop and Go (roll-off)	Carl Moyer Program (FY 2001-2002)

It is expected that any emission reductions resulting from emission reduction projects may benefit both the local area in which the emission reduction project is located and the region depending on the type and amount of air pollutants reduced. Emission reductions obtained from offset user fees, however, would be prohibited from generating future emission offsets, but would be retired for the benefit of the environment.

Based on the likely high costs of emission reduction projects, it is not anticipated that the emission reduction fees would produce the same quantity of emission reductions compared to the quantity of offsets obtained from the SCAQMD's internal offset accounts. Moreover, the emission reduction projects may not be located in the exact same place as the sources permitted in reliance upon offsets from the SCAQMD's internal offset accounts. Therefore, it is not likely that these emission reduction projects would reduce regional or localized air quality impacts to insignificance. The air quality, health, visibility and greenhouse gas effects of Alternative B and potential emission reduction projects are analyzed later in this chapter.

As noted above, Alternative B assumes that large businesses would continue to seek exemptions under Rule 1304 despite the requirement that they pay an offset user fee to benefit from the exemption. It therefore provides an impact analysis based on the emissions associated with continued development of new and modified sources by large businesses under Rule 1304. As explained below, Alternative C would prohibit access by large businesses to the Rule 1304 exemption altogether. The impact analysis in Alternative C assumes that without access to the Rule 1304 exemption, large businesses would not be able to undertake projects involving new or modified sources due to the high cost of obtaining offsets on the open market. Accordingly, these two alternatives reflect two possible scenarios: one in which development of new and modified sources under Rule 1304 by large businesses continues at levels equal to the project condition and a second in which there is no development of new and modified sources under Rule 1304 by large businesses. These two scenarios bracket a range of possible outcomes, depending upon the reaction of large businesses to payment of an offset user fee to qualify for exemption under Rule 1304 or to the cost of acquiring offsets in the open market if the Rule 1304 exemption is not available to them. There is no question that increasing the cost of developing a new or modified source under either scenario would restrain the rate of growth in commercial and industrial sources that would otherwise qualify for the Rule 1304 exemption. However, the extent to which projects involving new or modified sources of the type that are exempt under Rule 1304 would be undertaken by large businesses under either scenario would depend upon their ability to pay those costs. That ability would in turn vary significantly depending on factors such as the type of business involved, competition from smaller businesses and businesses outside of the district, growth in the region and general economic conditions.

Alternative C – Large Businesses Prohibited from Accessing Rule 1304 Exemptions

SCAQMD staff has received comments that large businesses should not have access to the SCAQMD's offset accounts because such facilities have the financial resources to purchase offsets on the open market. To address this comment relative to the proposed project, Alternative C would prohibit access by large businesses to the Rule 1304 Exemption. In all other aspects Alternative C would be identical to the proposed project.

General Effects of Alternative C

By prohibiting large businesses from qualifying for an exemption from offset requirements through Rule 1304, the SCAQMD would have to demonstrate equivalency with federal offset requirements for fewer facilities per year compared to the proposed project. Table 6-5 shows the future anticipated emissions from large businesses based on historical permitting data between 2001 through 2006 and projected for each future milestone year using 2007 AQMP growth projections for the relevant industry categories. Under Alternative C, the offsets previously available to large businesses qualifying for an exemption from offsets pursuant to Rule 1304, would no longer be

accessible by them. Table 6-5 shows emissions that would occur under the proposed project, but would not occur for each milestone year in the future under Alternative C. These data are used to quantify future emission impacts from Alternative C later in this chapter.

For the purposes of the analysis of Alternative C, it is assumed that average offset use by small businesses would not increase. This assumption is reasonable because it is unlikely that small business would substantially increase demand for offsets beyond average offset use on a year-to-year basis. Review of the historical data from 2001 through 2006 indicates that excess offsets were available that were not used. This historical information suggests that all small businesses needing offsets during the 2001 through 2006 timeframe were able to obtain them, i.e., there was no pent up demand for offsets from small businesses that was not provided by the SCAQMD.

Under Alternative C, large businesses would have to obtain credits on the open market. However, credits on the open market are in short supply; accordingly fewer facilities would be able to obtain permits for new or modified sources. Therefore, the analysis of Alternative C assumes that these facilities would not be built. Consequently, future air quality, health, visibility and greenhouse gas impacts and other indirect impacts as a result of implementing Alternative C would be less than for the proposed project.

Alternative D – Use of Credits Generated in 2009 and Beyond Only

Alternative D would only allow the use of credits generated in 2009 and beyond to be used to offset emissions from facilities that qualify for permits under Rules 1304 and 1309.1 in order to demonstrate equivalency with federal offset requirements. Specifically, under Alternative D, offsets in the SCAQMD's existing offset accounts would be eliminated. Instead, only new credits generated starting in 2009 and succeeding years could be used as offsets for demonstrating equivalency with federal offset requirements. Any unused credits in a given year would rollover to the next year. Because SCAQMD's previous offset accounts would be eliminated under Alternative D, use of offsets could not exceed the number of credits generated each year plus any credits rolled over from previous years, thus, effectively capping the number of offsets that can be used per year. In all other respects Alternative D is similar to the proposed project.

General Effects of Alternative D

Like the proposed project, the intent of Alternative D is to ensure that exempt sources under Rule 1304 and essential public services accessing the SCAQMD's Priority Reserve under Rule 1309.1 are fully offset to the extent required by federal law by valid emission reductions from the SCAQMD's internal offset accounts. Alternative D would achieve equivalency with federal requirements by establishing what types of reductions are eligible to be used to offset emissions and how those reductions are tracked.

Alternative D would allow the SCAQMD to recognize emission reductions generated from minor sources, such as shutdowns and minor source over-control that were not previously accounted for in the SCAQMD's federal equivalency demonstrations.

Under Alternative D, the SCAQMD's existing offset accounts would be eliminated. Only new credits generated in 2009 and after could be used to offset emission increases from sources that qualify for exemptions from offset requirements pursuant to Rules 1304 and 1309.1. For purposes of evaluating the potential effects of this alternative, it is assumed that none of the growth in emissions forecasted in the 2007 AQMP for the industries potentially eligible to receive permits under Rules 1304 and 1309.1 would occur. However, unlike conditions without the proposed project, emissions from shutdowns or reductions at facilities that previously received permits under Rules 1304 and 1309.1 could be replaced with emissions from new or modified sources receiving new permits under Rules 1304 and 1309.1. Table 6-7.1 shows projected emission reductions from shutdowns that would be available for use by stationary sources in the future under Alternative D. Compared to the proposed project, offset use under Alternative D would likely be substantially less, which would result in lower air quality, health, visibility and greenhouse gas impacts.

TABLE 6-7.1
Emission Reductions from Shutdowns of Currently Permitted Sources Obtaining
Offsets from SCAQMD Internal Offset Accounts

Years	VOC	NO _x	SO _x	PM ₁₀	PM _{2.5}	CO
Tons per Day						
2014	11.21	0.77	0.03	0.03	0.02	0.87
2023	15.57	1.05	0.04	0.04	0.03	1.37
2030	15.57	1.05	0.04	0.04	0.03	1.37
Pounds per Day						
2014	22,420	1,540	60	60	40	1,740
2023	31,140	2,100	80	80	60	2,740
2030	31,140	2,100	80	80	60	2,740

Alternative E – Limited Offset Availability

Like the proposed project, the intent of Alternative E is to ensure that exempt sources under Rule 1304 and essential public services accessing the SCAQMD's Priority Reserve under Rule 1309.1 are fully offset to the extent required by federal law by valid emission reductions from the SCAQMD's internal offset accounts. Alternative E would achieve equivalency with federal requirements by establishing what types of reductions are eligible to be used to offset emissions and how those reductions are tracked.

Alternative E would allow the SCAQMD to recognize emission reductions generated from minor sources, such as shutdowns and minor source over-control that were not previously accounted for in the SCAQMD's federal equivalency demonstrations.

The proposed project would limit the cumulative net emissions increases by all sources (major and minor) obtaining offsets from the Priority Reserve or exempt from offsets pursuant to Rule 1304 to levels based upon the growth assumptions in the 2007 AQMP for the relevant industry categories. Alternative E would limit the cumulative net emissions increases from those sources to levels set at 50 percent of the AQMP-based levels in the proposed project ("50 percent cap"). That is, staff would track the total net increases of each nonattainment air contaminant offset from the offset accounts from the start of implementation through the end of each reporting period and compare the results with the 50 percent caps included in the adopted rule for the corresponding period. If the cumulative net emission increase of any contaminant exceeded the cap, no further offsets of that contaminant would be available from the offset accounts until sufficient additional credits are tracked to bring the cumulative net emission increase to a level at least 10 percent below the applicable 50 percent cap. In other respects, Alternative E would be the same as the proposed project.

General Effects of Alternative E

Net offset use from Alternative E would be less than the net offset use from the proposed project. Under Alternative E, the analysis is based on the assumption that only half of the emissions attributed to growth in the industries potentially eligible to receive permits under Rules 1304 and 1309.1 would occur. The other category of emissions attributed to the proposed project, emissions from replacement of sources that shut down, would occur in an amount equal to the emissions projected for the proposed project. Because fewer offsets would be available under Alternative E, the SCAQMD would be able to demonstrate equivalency with federal offset requirements for fewer facilities. As a result, fewer facilities would likely be constructed and operated in the future, thus, reducing potential quality, health, visibility and greenhouse gas effects, as well as other indirect environmental impacts, compared to the proposed project (see also Chapter 7). Facilities that would no longer qualify for exemptions from offset requirements under Rules 1304 or 1309.1, would have to obtain offsets on the open market. However, offsets on the open market are in short supply.

EVALUATION OF THE COMPARATIVE EFFECTS OF THE PROJECT ALTERNATIVES

The following sections describe potential direct and indirect adverse environmental impacts, including air quality, visibility, and greenhouse gas impacts, that may be generated by each project alternative. Evaluations of the comparative merits of the

direct effects of the project alternatives compared to the proposed project are evaluated in this chapter.

Indirect impacts of the future new and modified facilities enabled by the proposed project, such as water impacts, etc., are referred to as indirect impacts. Potential adverse indirect impacts from the proposed project are discussed in the subchapters in Chapter 5 and for the project alternatives are evaluated in Chapter 7 and summarized in Table 7-2.

The analysis of the air quality, health, visibility and greenhouse gas impacts for the project alternatives uses the same methodology as was used for the proposed project. For information on the methodologies and assumptions used for the analysis, the reader is referred to Subchapter 4.0. Finally, determining significance is based on the same significance criteria described in Chapter 4.1, see in particular Tables 4.1-1 and 4.1-2.

Air Quality

Alternative A - No Project Alternative

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted. Under the No Project Alternative, it is assumed that facilities that previously relied on access to the SCAQMD's offset accounts in the past to demonstrate equivalency with federal offset requirements, through either Rule 1304 or Rule 1309.1, would no longer have access to those offsets when applying for a permit for new or modified equipment.

1. AQMP Consistency – Would Alternative A conflict with or obstruct the implementation of an Applicable Air Quality Plan?

The 2007 AQMP incorporates future growth projections for the entire region, based on data provided by the Southern California Association of Governments (SCAG). The SCAQMD is required to use SCAG's growth projections in its AQMP (Health & Safety Code §40460(b)). The AQMP includes the projected emissions resulting from this regional growth and sets forth measures and strategies for attaining air quality standards in spite of this growth. The AQMP takes into account future emissions from both stationary and mobile sources, as well as emissions from construction activities.

The analysis assumes that if the proposed project is not approved, a portion of the projected regional growth would not occur. Thus, from an air quality perspective, future emissions without the proposed project would be less than they would be under the project. The conditions without the project are potential improvements to air quality and associated health, visual and climate change effects beyond those improvements forecasted to occur under the AQMP. Therefore, Alternative A, like the proposed project, would not conflict with or obstruct the implementation of the AQMP.

2. Criteria Pollutant Emission Standards – Would Alternative A violate any air quality standard or contribute to an existing or projected air quality violation

Regional Mass Criteria Pollutant Emissions – Project Effects

The best approach for understanding the project-specific emission effects of the No Project Alternative is to compare its emissions with the proposed project, which are shown in Table 6-8. The emissions attributed to the project would not occur under the No Project Alternative. Thus, Table 6-8 can also be seen as the effects of the No Project Alternative i.e., the emission increases that would not occur, or looked at another way, emission reduction benefits compared to the proposed project impacts. For example, it is expected that the proposed project would generate approximately 16.99 tpd of VOC by 2014 compared to Alternative A, as shown in Table 6-8. Conversely, under Alternative A the 16.99 tpd of VOC would not be emitted.

TABLE 6-8
Reductions in Stationary Source Emissions – No Project Alternative
Compared to the AQMP

Milestone Years	Pollutant					
	VOC	NO _x	SO _x	CO	PM ₁₀	PM _{2.5}
Tons per Day						
2014	16.99	1.29	0.16	1.14	0.85	0.54
2023	34.52	2.38	0.49	4.16	2.84	1.8
2030	44.59	3.31	0.74	6.26	4.44	2.82
Pounds per Day						
2014	33,980	2,580	320	2,280	1,700	1,080
2023	69,040	4,760	980	8,320	5,680	3,600
2030	89,180	6,620	1,480	12,520	8,880	5,640

Under the No Project Alternative, it is assumed that facilities that previously relied on access to the SCAQMD's offset accounts in the past to demonstrate equivalency with federal offset requirements, through either Rule 1304 or Rule 1309.1, would no longer have access to those offsets when applying for a permit for new or modified equipment. Although these facilities could potentially obtain credits on the open market, these offsets, if available, would likely be unaffordable to most facilities.

As indicated in Subchapter 4.1, SCAQMD staff determined that total lead emissions in the district are approximately 18 lbs/day (6,517 lbs/yr) based on fiscal year (FY) 2006-

2007 data comprised of 566 facilities in the Basin that reported lead emissions. Lead emission impacts from the proposed project were calculated for the same milestone years evaluated for other emission impacts. Using AQMP growth projections, all the net increases from the 566 facilities reporting lead emissions were added together to determine the overall total net increase in lead emissions by 2030 in the Basin. As shown in Table 6-9, the maximum net increase in lead emissions by 2030 in the Basin from the proposed project would not exceed the SCAQMD's mass daily significance threshold for lead of three pounds per day. From the perspective of Alternative A, the lead emissions shown in Table 6-9 would not occur.

TABLE 6-9
Reductions in Lead Emissions - – No Project Alternative
Compared to the AQMP

Milestone Years	Lead (lbs/day)
2014	0.13
2023	0.45
2030	0.70

Cumulative Effects

The No Project Alternative would not result in direct adverse impacts that would combine with effects of other past, present and future projects. It is important to note, however, under the No Project Alternative, it is reasonably foreseeable that permits would be issued under SB 827 through May 1, 2012 and the SCAQMD would be required to provide offsets to three power plants from the SCAQMD's internal accounts. These actions would not result from the proposed project or the No Project Alternative.

Modeled Concentrations of Criteria Pollutants

Regional Criteria Pollutant Concentrations – Proposed Project Effects

a. Ozone Concentrations

In addition to analyzing mass criteria pollutant emissions from project alternatives, this PEA supplements the analysis by also providing each alternative's contribution to regional concentrations of criteria pollutants. The 2007 AQMP concludes that ozone and PM_{2.5} air quality will improve substantially in the future, even assuming the growth represented by the proposed project. The No Project Alternative reflects additional air pollutant concentration benefits that would be foregone if the proposed project is approved. Table 6-10 summarizes the predicted proposed project's contribution to average and maximum ozone concentrations in the Basin and Coachella Valley for the

milestone years of 2014, 2023 and 2030. The ozone concentrations in Table 6-10 reflect the ozone concentration improvements under Alternative A that would be foregone if the proposed project is adopted.

TABLE 6-10
Reductions in Regional Ozone Concentrations – No Project Alternative
Compared to the AQMP

Year	Basin Average Ozone (ppb)	Basin Maximum Station Ozone (ppb)	Coachella Valley Average Ozone (ppb)	Coachella Valley Maximum Station Ozone (ppb)
2014	0.9	1.4	0.5	0.6
2023	1.5	1.9	0.8	1.1
2030	2.6	2.9	1.1	1.3

b. Particulate Matter Concentrations

Table 6-11 summarizes predicted annual average and 24-hour (daily) average Basin and Coachella Valley PM2.5 and PM10 concentration improvements foregone as a result of implementing the proposed project estimated for the milestone years of 2014, 2023 and 2030. Looked at from the perspective of Alternative A, the PM2.5 and PM10 concentrations in Table 6-11 represent the PM2.5 and PM10 concentration improvements compared to the proposed project.

TABLE 6-11
Reductions in Regional PM2.5 and PM10 Concentrations – No Project Alternative
Compared to the AQMP

Milestone Year	Annual PM2.5 (µg/m ³)	Annual PM10 (µg/m ³)	Basin Daily PM2.5 (µg/m ³)	Basin Daily PM10 (µg/m ³)	Coachella Valley Annual PM2.5 (µg/m ³)	Coachella Valley Annual PM10 (µg/m ³)	Coachella Valley Daily PM2.5 (µg/m ³) Basin Annual PM2.5 (µg/m ³)	Coachella Valley Daily PM10 (µg/m ³)
2014	0.06	0.12	0.6	0.7	0.01	0.01	0.1	0.1
2023	0.15	0.32	1.2	1.8	0.03	0.03	0.1	0.1
2030	0.21	0.47	1.6	2.5	0.05	0.05	0.2	0.2

The pollutant concentrations identified on Tables 6-10 and 6-11 are the incremental decreases in concentrations of pollutants that would occur if the No Project Alternative is selected, i.e., concentration reduction benefits compared to the proposed project. Chapter 4.1 discusses the extent to which attainment of applicable air quality standards

could occur more quickly under No Project conditions compared to conditions under the proposed project.

c. NO₂ Concentrations

Regional modeling for NO₂ was performed and the results are described in the following paragraphs. Table 6-12 shows the concentration improvements of Alternative A compared to the proposed project. See subchapter 4.1 for additional information comparing NO₂ concentrations under the proposed project and conditions without the project.

TABLE 6-12
Reductions in Regional NO₂ Concentrations – No Project Alternative
Compared to the AQMP

Milestone Year	Basin 1-Hour Average NO₂ (ppb)	Basin Annual Average NO₂ (ppb)	Coachella 1-Hour Average NO₂ (ppb)	Coachella 24-Hour Average NO₂ (ppb)
2014	0	0	0	0
2023	1	0	0	0
2030	1	0	0	0

d. SO₂ Concentrations

From the perspective of Alternative A, Table 6-13 shows the SO₂ concentration improvements of the No Project Alternative compared to the proposed project. See subchapter 4.1 for additional information comparing SO₂ concentrations under the proposed project and conditions without the project.

TABLE 6-13
Reductions in Regional SO₂ Concentrations- No Project Alternative

Milestone Year	Basin 1-Hour Average SO₂ (ppb)	Basin 24-Hour Average SO₂ (ppb)	Basin Annual Average SO₂^b (ppb)
2014	1	0	0
2023	1	0	0
2030	1	0	0

^a SO₂ is not measured in the Coachella Valley.

^b Annual average daily SO_x emissions from all point and areas sources are less than 0.04 tons per day.

e. Carbon Monoxide (CO) Concentrations

The Basin is currently in attainment of both the California and federal 1-hour and 8-hour CO standards. Current maximum ambient concentrations are less than 50 percent of the 8-hour standard in the most heavily affected portions of the Basin. The 2008 winter planning emissions inventory (2007 AQMP, Appendix III) estimated total Basin emissions at 3,180 tons per day. Mobile sources account for more than 91 percent of the emissions inventory. The stationary and area source inventory comprises less than nine percent (281 tons per day) of the total inventory.

Ambient concentrations of carbon monoxide respond linearly to changes in the emissions inventory. Table 6-14 shows the effects of the proposed project on ambient CO concentrations in the Basin. Under Alternative A, the CO concentration effects shown in the table would not occur. See subchapter 4.1 for additional information comparing CO concentrations under the proposed project and conditions without the project.

TABLE 6-14
Reductions in Regional CO Concentrations – No Project Alternative
Compared to the AQMP

Milestone Year	Change in Concentration (ppm)
2014	0.00
2023	0.01
2030	0.01

Regional Criteria Pollutant Concentrations-- Cumulative Effects

The No Project Alternative would not contribute to concentrations of pollutants that would combine with effects of other past, present and future projects.

Localized Criteria Pollutant Concentrations

Tables 4.1-21 and 4.1-22 in Chapter 4 show that the proposed project has the potential to increase local PM_{2.5} concentrations at sensitive receptors that may be located near future representative facilities. Similarly, Tables 4.1-23 through 4.1-25 show that the proposed project has the potential to increase local NO₂ concentrations at sensitive receptors that may be located near future representative facilities. These impacts would be avoided under the No Project Alternative because the No Project Alternative assumes no new permits for new or modified sources are issued under Rules 1304 and 1309.1 in reliance upon proposed Rule 1315.

3. *Health Effects – Would Alternative A Expose Sensitive Receptors to Substantial Pollutant Concentrations*

a. *Region-wide emissions of criteria pollutants*

The analysis of the project impacts includes a comparison of the health impacts of the proposed project and Alternative A, based on the projected Basin ozone, PM_{2.5}, and PM₁₀. Increases in criteria pollutant emissions may result in potential adverse health effects including the following: cardiovascular, neurological, reproductive and respiratory diseases. Health effects have been evaluated by modeling criteria pollutant concentrations, which can provide information on mortality, hospital admissions, emergency room visits, minor restricted activity days, school absence days, loss of work days, and cases of acute/chronic bronchitis, nonfatal heart attacks and adverse upper/lower respiratory conditions.

Table 6-15 shows the estimated health effects from the No Project Alternative as a result of exposures to ozone for the milestone years of the analysis. These impacts represent additional benefits, beyond the benefits forecasted in the 2007 AQMP Final Socioeconomic Report that could occur if the proposed project were not implemented, nor replaced by other growth.

TABLE 6-15
Reductions in Estimated Ozone Health Impacts – No Project Alternative
Compared to the AQMP

Year	Mortality Deaths (People)	Hospital Admissions (People)	Minor Restricted Activity Days (Days)	School Absences (Days)
2014	7	42	29,575	31,172
2023	12	71	49,513	52,186
2030	20	122	85,339	89,947

Table 6-16 provides the same analysis with respect to PM_{2.5} and PM₁₀ emissions PM_{2.5} and PM₁₀ for the milestone years of the analysis. As explained in Subchapter 4.1, the health effects shown in Tables 4.1-27 and 4.1-28 and Table 6-16 below represent additional health benefits beyond the benefits forecasted in the 2007 AQMP Final Socioeconomic Report that could occur if the proposed project were not implemented, nor replaced by other growth.

TABLE 6-16
Reductions in Estimated Annual PM_{2.5} and PM₁₀ Health Impacts – No Project
Alternative Compared to the AQMP

Year	Mortality Deaths (People)	Acute Bronchitis (People)	Chronic Bronchitis (People)	Non-fatal Heart Attacks (People)	Upper/Lower Respiratory (People)	Emergency Room Visits	Hospital Admissions (People)	Minor Restricted Activity Days	Work Loss (Days)
2014	33	59	18	29	1,262	11	13	23,374	4,074
2023	86	155	46	74	3,283	29	34	60,814	10,601
2030	125	224	66	108	4,763	42	50	88,214	15,377

Region-wide Emissions of Criteria Pollutants-- Cumulative Effects

The No Project alternative would not result in adverse health effects that would combine with effects of other past, present and future projects.

b. Region-wide emissions of TACs

Basin toxic risks (measured in cancer risk per million person population over a lifetime (70 years) of exposure) were estimated using the MATES-III modeling platform for 2014, 2023 and 2030 model year simulations. According to the MATES-III study completed by SCAQMD in 2008, total Basin population-weighted cancer risk from air pollution is 853 in one million (853×10^{-6}), which is based on the modeling exposures over the entire Basin. Approximately 94 percent of this risk is caused by mobile source emissions, primarily diesel particulates (84 percent). Total risk from industrial sources, which include industries, and businesses such as dry cleaners and chrome plating operations, is approximately 50 in one million (51×10^{-6}).

Table 6-17 summarizes the region-wide cancer risk reduction foregone as a result of implementing the proposed project. Alternative A would result in benefits equivalent to the amounts shown in Table 6-17.

The cancer risk reductions not achieved if the proposed project were implemented would not exceed the SCAQMD's cancer risk significance threshold of 10 in one million (10×10^{-6}). However, the proposed project would result in a cancer burden risk that exceeds the SCAQMD's cancer burden significance threshold of 0.5. Alternative A would avoid this significant impact.

TABLE 6-17
Reductions in Cancer Risk and Cancer Burden Impacts – No Project Alternative
Compared to the AQMP

Milestone Years	Cancer Risk Reduction^a	Cancer Burden Reduction
2014	0.91	16
2023	2.86	54
2030	4.4	86

^a Additional cases of cancer in a population of one million individuals.

Table 6-18 provides the change in chronic HI in overall population-weighted values between the conditions with and without the proposed project. Acute HIs were calculated for each hour in each population area and the highest value is identified. Similar to the chronic HIs, the change in acute HIs reflect overall population-weighted values between the conditions with and without the proposed project is provided in Table 6-18. Under Alternative A, the non-cancer health risks identified in Table 6-14 would not occur.

Table 6-18
Reductions in Chronic and Acute Health Risk – No Project Alternative
Compared to the AQMP

Year	Chronic Health Index Not Achieved	Acute Health Index Not Achieved
2014	0.0	0.02
2023	0.02	0.05
2030	0.02	0.08

Cumulative Effects.

The No Project alternative would not contribute to cancer and non-cancer health risks from past, present and future projects.

c. Localized Emissions of TACs

Under Alternative A, it is assumed that no permits would be approved under Rule 1304 or Rule 1309.1 pursuant to proposed Rule 1315. As such, the localized toxic air contaminant impacts under the No Project Alternative would be zero.

4. Odors – Would Alternative A Create Objectionable Odors Affecting a Substantial Number of People

Some of the stationary source equipment permitted under Rules 1304 and 1309.1 could create objectionable odors. Under Alternative A potential odor impacts that could occur under the proposed project would be eliminated.

Visibility Impacts

5. Visibility. Would the Alternative A create significant aesthetic impacts by resulting in air emissions that substantially degrade the existing visual character or quality of the project surroundings?

Project Effects

Visual character or visibility is a manifestation of air quality, i.e., the worse the air quality the more visual character or visibility is adversely affected. In general, perception of visibility beyond eight to 10 miles is very subjective and subtle changes in range are not easily detected by the eye. (Until recent upgrades in automated monitoring, many military airports would not report range more than eight miles). California continues to maintain a state standard for visibility structured to reduce aerosol particles (8-hour average) that contribute to an extinction coefficient value of 0.23 per kilometer (or 10 miles of visual range) when relative humidity is less than 70 percent. The previous form of the standard assessed the number of days when visual range was less than 10 miles for the same humidity consideration.

The project values for the extinction coefficient predicted for the eastern Basin represented by Riverside-Rubidoux (the worst case), are from 0.063 to 0.067 from 2014 to 2030, or one-third of the California standard (Table 6-19). The maximum predicted impact on the light extinction coefficient ($.001 \text{ km}^{-1}$) attributable to the proposed project would not cause or contribute to a violation of the state standard, and is not significant. The No Project Alternative would avoid these effects.

Table 6-19
Reductions in Visibility Impacts at Riverside-Rubidoux
Measured in Extinction Coefficient and Visual Range (miles) - No Project Alternative

Milestone Year	Predicted Extinction Coefficient Without the Project (km^{-1})	Project Impact on Extinction Coefficient	Visual Range Without Project (miles)	Project Difference in Miles
2014	0.0672	0.0002	35.512	-0.091
2023	0.0629	0.0005	39.290	-0.274
2030	0.0656	0.0008	37.633	-0.469

In Class I areas that could potentially be affected by the proposed project, the deciview is directly used as the metric for visibility assessment in the federal Regional Haze visibility standard. A 0.5 deciview change is used to assess significance in Class I wilderness areas. The 0.5 deciview metric is equivalent to a five percent change in the local extinction coefficient. While California continues to maintain a threshold-based state standard for visibility as defined above, the downwind impacts to Class I areas that typically have greater base visual range and a lower base extinction coefficient are better characterized by the more responsive deciview index. Table 6-20 summarizes the project's predicted visibility impacts with respect to the federal standard for Class I areas. Under the federal standard, a 0.5 deciview change would be considered a significant project impact and a cumulatively considerable contribution to a significant cumulative impact. The maximum project impact measured in deciviews would be less than 0.06 in all cases, which is not significant. The visibility changes presented on Table 6-20 are the incremental degradations in visibility that would not occur if the No Project Alternative were selected. Alternative A would eliminate the proposed project's less-than-significant effect on visibility.

Table 6-20
Reductions in Impacts to Visibility at Class-I Wilderness Areas Measured in Deciview and Visual Range – No Project Alternative Compared to the AQMP

Area Impacted	Predicted Deciview Value Without Project	Total Project Impact (Difference in Deciviews)	Predicted Visual Range Without Project (miles)	Project Impact (miles)
2014				
Agua Tibia	17.709	0.007	41.463	0.022
San Gabriel	16.566	0.014	49.529	0.058
Cucamonga	16.032	0.012	50.620	0.049
San Gorgonio	13.037	0.006	67.717	0.023
San Jacinto	13.964	0.006	60.644	0.02
Joshua Tree	11.251	0.005	90.694	0.017
2023				
Agua Tibia	17.699	0.02	41.497	-0.081
San Gabriel	16.262	0.042	50.709	-0.194
Cucamonga	15.732	0.03	51.881	-0.147
San Gorgonio	12.986	0.018	67.866	-0.114
San Jacinto	13.940	0.014	60.735	-0.086
Joshua Tree	11.297	0.005	90.396	-0.075

Table 6-20 (Concluded)
Reductions in Impacts to Visibility at Class-I Wilderness Areas Measured in Deciview and Visual Range – No Project Alternative Compared to the AQMP

2030				
Agua Tibia	17.781	0.022	41.161	-0.088
San Gabriel	16.321	0.058	50.405	-0.265
Cucamonga	15.865	0.049	51.224	-0.243
San Gorgonio	13.124	0.023	67.006	-0.138
San Jacinto	14.056	0.020	60.075	-0.119
Joshua Tree	11.378	0.017	89.893	-0.108

Cumulative Effects

The No Project alternative would not contribute to cumulative impacts on visibility.

Climate Change Impacts Analysis

6. Greenhouse Gas Emissions – Would Alternative A result in greenhouse gas emissions that may have a significant impact on the environment, based on any applicable threshold of significance?

Project Effects

The analysis of GHGs takes two approaches in order to capture all six GHG pollutants identified in AB 32. First, SO_x emissions were selected as a surrogate to prorate the GHG emissions because SO_x emissions result primarily from sulfur contained in fossil fuels. Using a ratio of GHG emissions to SO_x emissions from the AQMP inventory, the GHG emissions from the proposed project and project alternatives are calculated using the estimated SO_x emissions from the proposed project and multiplying by the ratio factor (see subchapter 4.0 and Appendix D-1).

Second, an analysis of the statewide inventory was conducted to determine the impact from the remaining GHG pollutants, including HFCs, PFCs and SF₆. Combustion GHG emissions are proportional to SO_x emissions, while emissions of HFCs, PFCs and SF₆ are analyzed as proportional to emissions of CO₂, CH₄ and N₂O, based on the statewide inventory (see Subchapter 4.0 and Appendix D-1).

Table 6-21 shows the total GHG emissions from all six GHG pollutants attributed to the proposed project. Under Alternative A, the GHG emissions in Table 6-21 would not occur.

TABLE 6-21
Reductions in SO_x and Greenhouse Gas Emissions – No Project Alternative
Compared to the AQMP

Milestone Years	SO_x Emissions (tons/day)	SO_x Emissions (tons/year)	CO₂, CH₄ and N₂O Emissions (million MT CO₂ eq /year)	HFCs, PFCs and SF₆ Emissions¹ (million MT CO₂ eq /year)	TOTAL GHG Emissions² (million MT CO₂ eq /year)
2014	0.16	58.4	4.52	0.29	4.81
2023	0.49	178.85	13.83	0.89	14.74
2030	0.74	270.1	20.89	1.36	22.26

1. Calculated based on ratio of 0.065 of high GWP/total GHGs. Thus, CO₂, CH₄ and N₂O Emissions x 0.065 = HFCs, PFCs and SF₆ emissions (for example, 4.52 million MT CO₂ eq /year x 0.065 = 0.29 million MT CO₂ eq /year)

2. Total GHG emissions = CO₂, CH₄ and N₂O Emissions + HFCs, PFCs and SF₆ emissions

SCAQMD's currently adopted Tier 3 GHG significance threshold for SCAQMD lead agency projects is 10,000 MT CO₂eq per year. Projects with incremental increases below this threshold are not considered to be cumulatively considerable. As shown in Table 6-17, potential GHG emissions from the proposed project exceed 10,000 MT CO₂eq per year and are concluded to be significant. Therefore, GHG emissions from are considered to be cumulatively considerable (CEQA Guidelines §15065(a)(3)), so are expected to contribute to significant adverse climate change impacts. Under Alternative A, the GHG impacts shown in Table 6-17 would not occur.

Cumulative Effects

Alternative A, the No Project Alternative, would not contribute to cumulative climate change impacts.

Alternative B –User Fees for Large Businesses

1. AQMP Consistency – Would Alternative B Conflict with or Obstruct the Implementation of an Applicable Air Quality Plan?

Like the proposed project, Alternative B would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. Therefore, the intent of Alternative B is to maintain consistency with Regulation XIII, i.e., to ensure that there are no net increases in emissions from new or modified permitted sources. Although the AQMP provides strategies for attaining and maintaining the NAAQSs and CAAQSs, it is considered to be a growth accommodating document. Alternative B would allow the use of offsets up to the 2007 AQMP growth projection cap.

Emissions from Alternative B are not expected to conflict with or obstruct the implementation of the AQMP because offsets cannot be issued above the emissions

caps, which are based on growth projections of the 2007 AQMP for the relevant industry categories. Because regional criteria pollutant emissions from Alternative B are expected to be less than the regional criteria pollutant emissions from the project, the potential for conflict with the 2007 AQMP would be even less likely.

2. Criteria Pollutant Emission Standards – Would Alternative B Violate any Air Quality Standard or Contribute to an Existing or Projected Air Quality Violation

a. Alternative B – Region-wide emissions of criteria pollutants

Emissions from sources with permits issued in reliance on offsets in the SCAQMD's internal accounts under Alternative B would be the same as the emissions from the proposed project because Alternative B would be subject to the same cap. However, under Alternative B, a reduction in those emissions would occur due to use of a large business user fee to fund emissions-reducing projects.

The primary difference between the proposed project and Alternative B is that under Alternative B large businesses would be subject to a large business user fee based on the quantity of emissions to be offset. Based on historical permit data, Table 6-22 shows emissions from large businesses and the potential large business user fees that could be charged per pound of pollutant under Alternative B. It should be noted that the emissions shown in Table 6-22 constitute a subset of the total proposed project emissions. By multiplying the emissions from large businesses by the emission fee per pollutant (Table 6-22), potential emission fees collected for each timeframe can be calculated (Table 6-23).

TABLE 6-22
Emissions from Large Businesses and Large Business User Fees

Milestone Years	Pollutant					
	VOC	NO _x	SO _x	CO	PM ₁₀	PM _{2.5}
Tons per Day						
2014	1.39	0.12	0.03	0.04	0.09	0.06
2023	4.55	0.31	0.09	0.39	0.31	0.20
2030	6.97	0.52	0.15	0.68	0.48	0.31

TABLE 6-22 (Concluded)
Emissions from Large Businesses and Large Business User Fees

Milestone Years	Pollutant					
	VOC	NO _x	SO _x	CO	PM ₁₀	PM _{2.5}
Pounds per Day						
2014	2,780	240	60	80	180	120
2023	9,100	620	180	780	620	400
2030	13,940	1,040	300	1,360	960	620
Dollars per Pound						
Large Business Fee ^a	\$12,170	\$77,203	\$61,048	None	\$145,562	None

^a Based on weighted average of 2007 and 2008 ERC purchase prices and 25% premium. Sums may not be exact due to rounding.

TABLE 6-23
Potential Large Business User Fees Collected per Pollutant^a

Milestone Years	Fees Collected by Pollutant				
	VOC	NO _x	SO _x	PM ₁₀	TOTAL
2014	\$52,820,000	\$18,528,720	\$3,662,880	\$26,201,160	\$101,212,460
2023	\$172,900,000	\$47,865,860	\$10,988,640	\$90,248,440	\$322,002,940
2030	\$264,860,000	\$80,291,120	\$18,314,400	\$139,739,520	\$503,205,040

^a Total fee = large business emissions (ton/day) x 2000 (pounds/ton) x mitigation fee (dollars/pound).

The analysis assumes that once collected, under Alternative B large business user fees would fund emission reduction projects similar to those shown in Table 6-4 (see also Table 7-6 in Chapter 7), which would offset some of the emissions associated with implementing Alternative B. However, because it is unknown at this time and cannot be known what specific types of emission reduction projects would be implemented in the future, it is not possible to quantify the emissions reduction associated with each potentially funded project. Instead, to determine the effects of the large business user fees, SCAQMD staff used the following approach. First, staff identified the BACT incremental cost effectiveness, i.e., the cost per ton of pollutant reduced by pollutant based on the typical cost effectiveness of BACT equipment adjusted for 2010 dollars (Table 6-24). Once the BACT equipment adjustment factor is determined, the total amount of fees collected for each pollutant (Table 6-24) is then divided by the BACT adjustment factor for that pollutant (Table 6-25). Because BACT cost effectiveness includes a capital recovery factor amortized over 10 years (the assumed life of the

project), the result is then multiplied by the amortized capital recovery factor to obtain anticipated emission reductions by pollutant, based on the fees collected. Applying this methodology produces the emission reductions from Alternative B, which are shown in Table 6-25.

TABLE 6-24
BACT Incremental Cost Effectiveness by Pollutant (Dollars per Ton)

	VOC	NO _x	SO _x	PM ₁₀
MSBACT, July 2004 ^a	\$60,600	\$57,200	\$30,300	\$13,400
Adjusted for 2010 ^b	\$78,356	\$73,960	\$39,178	\$17,326

^a Cost adopted in 1995 BACT Guidelines and adjusted to second quarter 2003 dollars using Marshall & Swift Equipment Cost Index.

^b Cost adjusted to first quarter 2010 dollars using Marshall & Swift Equipment Cost Index (Chemical Engineering April 2010).

TABLE 6-25
Emissions Reductions from the Large Business User Fees

Milestone	VOC	NO _x	SO _x	CO	PM ₁₀	PM _{2.5}
Tons per Day						
2014	1.39	0.12	0.03	0.04	0.09	0.06
2023	4.55	0.31	0.09	0.39	0.31	0.2
2030	6.97	0.52	0.15	0.68	0.48	0.31
Pounds per Day						
2014	2,780	240	60	80	180	120
2023	9,100	620	180	780	620	400
2030	13,940	1,040	300	1,360	960	620

Assumes facilities operate 50 weeks/year, five days/week.

Emission reduction = total fee (dollars)/incremental BACT cost effectiveness (dollars/ton reduced).

Once emissions reductions from use of the large business user fees have been quantified (Table 6-25), they are subtracted from the Alternative B emissions. Remaining emissions compared to the proposed project emissions and are shown in Table 6-26. As can be seen in Table 6-26, emissions of criteria pollutants from Alternative B would be significant, but would be less than the emissions from the proposed project.

TABLE 6-26
Proposed Project and Alternative B Stationary Source Emissions

Milestone Years	Pollutant					
	VOC	NO _x	SO _x	CO	PM ₁₀	PM _{2.5}
Proposed Project - Tons per Day						
2014	16.99	1.29	0.16	1.14	0.85	0.54
2023	34.52	2.38	0.49	4.16	2.84	1.8
2030	44.59	3.31	0.74	6.26	4.44	2.82
Proposed Project - Pounds per Day						
2014	33,980	2,580	320	2,280	1,700	1,080
2023	69,040	4,760	980	8,320	5,680	3,600
2030	89,180	6,620	1,480	12,520	8,880	5,640
Alternative B - Tons per Day						
2014	16.78	1.16	0.11	1.14	0.10	0.06
2023	33.83	2.06	0.35	4.16	0.28	0.18
2030	43.52	2.77	0.51	6.26	0.48	0.30
Alternative B - Pounds per Day						
2014	33,560	2,320	220	2,280	200	120
2023	67,660	4,120	700	8,320	560	360
2030	87,040	5,540	1,020	12,520	960	600
Regional Significance Thresholds (Pounds per Day)						
Significance Threshold	55	55	150	550	150	55
Significant?	Yes	Yes	Yes	Yes	Yes	Yes

As indicated in Subchapter 4.1, SCAQMD staff determined that total lead emissions in the district are approximately 18 lbs/day (6,517 lbs/yr) based on fiscal year (FY) 2006-2007 data comprised of 566 facilities in the Basin that reported lead emissions. Lead emission impacts were calculated for the same milestone years evaluated for other emission impacts. As shown in Table 6-27, the maximum net increase in lead emissions by 2030 in the Basin from the proposed project and the cumulative scenario with the proposed project would not exceed the SCAQMD's mass daily significance threshold for lead of three pounds per day. Similarly, Table 6-27 shows that lead emission impacts from Alternative B and the cumulative scenario with Alternative B would be less-than-significant.

TABLE 6-27
Proposed Project and Alternative B –
Project-Specific and Cumulative Lead Emissions

Milestone Years	Lead (lbs/day)			
	Proposed Project	Cumulative with Proposed Project	Alternative B	Cumulative with Alternative B
2014	0.13	0.33	0.02	0.26
2023	0.45	0.50	0.04	0.25
2030	0.70	0.63 ¹	0.08	0.25

Cumulative Effects

As explained in Chapters 4.0 and 4.1, the cumulative impact analysis includes emissions from sources permitted under Rules 1304 and 1309.1 under the prior version of Rule 1315 and SB 827. In addition, the cumulative impacts analysis includes emissions from three power plants.

Table 6-28 shows the total mass emissions from stationary sources under Alternative B plus the other sources included in the cumulative scenario. Based on the data shown in Table 6-28, cumulative impacts from Alternative B would be significant, but less significant than the proposed project. Further, based on the emissions shown in Table 6-28, Alternative B's contribution to cumulative impacts is considered to be cumulatively considerable.

TABLE 6-28
Proposed Project and Alternative B Cumulative Stationary Source Mass Emissions

Milestone Years	Pollutant					
	VOC	NOx	SOx	CO	PM10	PM2.5
Cumulative With Proposed Project – Tons per Day						
2014	23.71	4.7	0.47	10.82	3.47	2.87
2023	40.76	5.64	0.79	14.36	5.29	4.02
2030	50.74	6.61	1.04	16.55	6.79	4.97

¹ For lead emitting facilities, in the early years of the analysis there were some SIC facility categories with negative growth factors, resulting in lower overall lead emissions. Based on this factor, the cumulative net increase in lead emissions was determined to be lower than the proposed project because it included more years of negative growth.

TABLE 6-28 (Concluded)
Proposed Project and Alternative B Cumulative Stationary Source Mass Emissions

Milestone Years	Pollutant					
	VOC	NOx	SOx	CO	PM10	PM2.5
Cumulative With Proposed Project -Pounds per Day						
2014	47,420	9,400	940	21,640	6,940	5,740
2023	81,520	11,280	1,580	28,720	10,580	8,040
2030	101,480	13,220	2,080	33,100	13,580	9,940
Cumulative With Alternative B - Tons per Day						
2014	23.50	4.58	0.42	10.82	2.73	2.40
2023	40.07	5.33	0.66	14.35	2.72	2.40
2030	49.67	6.07	0.81	16.54	2.82	2.46
Cumulative With Alternative B - Pounds per day						
2014	47,000	9,140	840	21,640	5,460	4,800
2023	80,140	10,660	1,320	28,700	5,440	4,800
2030	99,340	12,140	1,620	33,080	5,640	4,920
Regional Significance Thresholds (Pounds per Day)						
Significance Threshold	55	55	150	550	150	55
Significant?	Yes	Yes	Yes	Yes	Yes	Yes

Modeled Concentrations of Criteria Pollutants

Regional Criteria Pollutant Concentrations – Alternative B

a. Ozone Concentrations

In addition to analyzing project-specific effects of Alternative B in terms of mass emissions of criteria pollutants, this PEA includes a supplemental analysis of the contribution of Alternative B to regional concentrations of these same criteria pollutants.

Air quality is expected to improve under future conditions, with or without the proposed project or alternatives. Table 6-29 presents the contributions from Alternative B to the Basin and Coachella Valley ozone concentrations for the milestone years of 2014, 2023, and 2030 in terms of the difference in ozone concentrations under Alternative B compared to conditions without the proposed project. As explained in subchapter 4.1, no new significance criteria are applied to this analysis. Rather, this section is intended

to further describe the degree to which emissions of criteria pollutants would affect regional air quality.

As shown in the table, for most milestone years in the Basin, Alternative B would contribute less to ozone concentrations than the proposed project. Alternative B would also contribute equal or less to maximum ozone concentrations in the Coachella Valley. Due to the non-linearity of ozone formation, the average ozone impact to the Coachella Valley, which includes the far downwind impacts to Indio (greater than 125 miles east of Los Angeles), is nominally higher (1.0 ppb) for Alternative B than the proposed project for the milestone years 2014 and 2023. Another way of looking at the results in Table 6-29 is that for most years, Basin and Coachella Valley ozone concentration improvements foregone from Alternative B are equal to or less than the proposed project.

TABLE 6-29
Proposed Project and Alternative B - Contribution to Regional Ozone Concentrations
(Peak 8-hour concentrations)

Milestone Years	Basin Average Ozone (ppb)	Basin Maximum Station Ozone (ppb)	Coachella Valley Average Ozone (ppb)	Coachella Valley Maximum Station Ozone (ppb)
Proposed Project				
2014	0.9	1.4	0.5	0.6
2023	1.5	1.9	0.8	1.1
2030	2.6	2.9	1.1	1.3
Alternative B				
2014	0.9	1.3	0.6	0.6
2023	1.4	1.8	0.9	1.0
2030	2.5	2.8	1.1	1.2

b. Particulate Matter Concentrations

Table 6-30 shows the contribution of emissions from Alternative B to the predicted annual average and 24-hour (daily) average Basin and Coachella Valley PM_{2.5} and PM₁₀ concentrations estimated for the milestone years of 2014, 2023 and 2030 compared to the proposed project. As shown in the table, for most milestone years, Alternative B contributes less to regional concentrations of particulate matter than the proposed project. Another way of looking at the results in Table 6-30 is that for most years Basin and Coachella Valley predicted annual average and 24-hour average Basin and Coachella Valley PM_{2.5} and PM₁₀ concentration improvements foregone from Alternative B are equal to less than the proposed project.

TABLE 6-30
Proposed Project and Alternative B – Contributions to Regional PM2.5 and PM10 Concentrations

Milestone Year	Annual PM2.5 (µg/m ³)	Annual PM10 (µg/m ³)	Basin Daily PM2.5 (µg/m ³)	Basin Daily PM10 (µg/m ³)	Coachella Valley Annual PM2.5 (µg/m ³)	Coachella Valley Annual PM10 (µg/m ³)	Coachella Valley Daily PM2.5 (µg/m ³) Basin Annual PM2.5 (µg/m ³)	Coachella Valley Daily PM10 (µg/m ³)
Proposed Project								
2014	0.06	0.12	0.6	0.7	0.01	0.01	0.1	0.1
2023	0.15	0.32	1.2	1.8	0.03	0.03	0.1	0.1
2030	0.21	0.47	1.6	2.5	0.05	0.05	0.2	0.2
Alternative B								
2014	0.04	0.08	0.5	0.6	0.01	0.01	0.1	0.1
2023	0.08	0.18	1.1	1.2	0.02	0.02	0.1	0.1
2030	0.11	0.24	1.5	1.5	0.02	0.02	0.2	0.2

c. NO2 Concentrations

Table 6-31 shows the contributions to regional NO2 concentrations from Alternative B compared to the proposed project. The regional NO2 concentration analysis is based on an emissions-weighted approach to estimate the incremental contributions of NO2 from Alternative B compared to the without project conditions. As Table 6-31 shows, Alternative B and the proposed project would result in NO2 concentrations of 1.0 ppb or less for all milestone years, regardless of the averaging time.

TABLE 6-31
Alternative B and the Proposed Project – Contributions to Regional NO2 Concentrations

Milestone Year	Basin 1-Hour Average NO ₂ (ppb)	Basin Annual Average NO ₂ (ppb)	Coachella 1-Hour Average NO ₂ (ppb)	Coachella 24-Hour Average NO ₂ ^b (ppb)
Proposed Project				
2014	0	0	0	0
2023	1	0	0	0
2030	1	0	0	0

TABLE 6-31 (Concluded)
Alternative B and the Proposed Project – Contributions to Regional NO₂ Concentrations

Milestone Year	Basin 1-Hour Average NO₂ (ppb)	Basin Annual Average NO₂ (ppb)	Coachella 1-Hour Average NO₂ (ppb)	Coachella 24-Hour Average NO₂^b (ppb)
Alternative B				
2014	0	0	0	0
2023	1	0	0	0
2030	1	0	0	0

d. SO₂ Concentrations

Table 6-32 shows the contributions to regional SO₂ concentrations from Alternative B compared to the proposed project. The regional SO₂ concentration analysis is also based on an emissions-weighted approach to estimate the incremental increased contributions of SO₂ from Alternative B compared to the without project conditions. Both Alternative B and the proposed project would result in contributions to SO₂ concentrations in the Basin of 0.04 ton per day, which is less than 0.1 percent of the Basin SO_x emissions, and less than 1.0 ppb for all milestone years, regardless of the averaging time. SO₂ is not measured in the Coachella Valley because there are so few SO₂ emissions sources.

TABLE 6-32
Alternative B and the Proposed Project – Contributions to Regional SO₂ Concentrations^a

Milestone Year	Basin 1-Hour Average SO₂ (ppb)	Basin 24-Hour Average SO₂ (ppb)	Basin Annual Average SO₂^b (ppb)
Proposed Project			
2014	1	0	0
2023	1	0	0
2030	1	0	0
Alternative B			
2014	0	0	0
2023	1	0	0
2030	1	0	0

^a SO₂ is not measured in the Coachella Valley.

^b Annual average daily SO_x emissions from all point and areas sources are less than 0.04 tons per day, but are rounded up to the nearest whole number.

e. CO Concentrations

Ambient concentrations of carbon monoxide respond linearly to changes in the emissions inventory. Table 6-33 shows contributions to ambient CO concentrations in the Basin from Alternative B compared to the proposed project. Table 6-33 shows that contributions to CO concentrations from Alternative B are equal to contributions to CO concentrations from the proposed project.

TABLE 6-33
Alternative B and the Proposed Project –
Contributions to Regional CO Concentrations

Milestone Year	Change in Concentration (ppm)	
	Proposed Project	Alternative B
2014	0.00	0.00
2023	0.01	0.01
2030	0.01	0.01

Regional Criteria Pollutant Concentrations-- Cumulative Effects

a. Cumulative Ozone Concentrations

In addition to analyzing project-specific contributions of Alternative B to regional pollutant concentrations, this PEA includes an analysis of the combined contributions to regional pollutant concentrations from Alternative B plus other sources receiving permits in reliance upon the SCAQMD's internal offset accounts. Table 6-34 presents the contribution to regional ozone concentrations from such sources in the Basin and Coachella Valley for the milestone years of 2014, 2023, and 2030 in terms of the ozone concentrations for the cumulative scenario with Alternative B compared to the cumulative scenario with the proposed project. As shown in the table, the cumulative scenario with Alternative B results in the same or less contributions to regional ozone concentrations than the proposed project.

TABLE 6-34
Proposed Project and Alternative B Cumulative Scenarios – Contributions to
Regional Ozone Concentrations (Peak 8-hour concentrations)

Year	Basin Average Ozone (ppb)	Basin Maximum Station Ozone (ppb)	Coachella Valley Average Ozone (ppb)	Coachella Valley Maximum Station Ozone (ppb)
Cumulative With Proposed Project				
2014	1.1	1.8	0.8	0.8
2023	2.0	2.5	1.0	1.3
2030	3.0	3.5	1.3	1.6
Cumulative With Alternative B				
2014	1.1	1.8	0.7	0.8
2023	1.5	1.6	0.6	0.7
2030	2.8	3.0	0.9	1.1

b. Cumulative Particulate Matter Concentrations

Table 6-35 shows the predicted contribution of regional particulate matter concentrations from Alternative B with the cumulative scenario compared to the proposed project with the cumulative scenario in terms of the contributions to predicted annual average and 24-hour (daily) average Basin and Coachella Valley PM2.5 and PM10 concentrations estimated for the milestone years of 2014, 2023 and 2030. As shown in the table, for most milestone years, the cumulative scenario with Alternative B would contribute less to regional particulate matter concentrations than the cumulative scenario with the proposed project.

TABLE 6-35
Proposed Project and Alternative B Cumulative Scenarios –Contributions to Regional
PM2.5 and PM10 Concentrations

Milestone Year	Annual PM2.5 (µg/m³)	Annual PM10 (µg/m³)	Basin Daily PM2.5 (µg/m³)	Basin Daily PM10 (µg/m³)	Coachella Valley Annual PM2.5 (µg/m³)	Coachella Valley Annual PM10 (µg/m³)	Coachella Valley Daily PM2.5 (µg/m³) Basin Annual PM2.5 (µg/m³)	Coachella Valley Daily PM10 (µg/m³)
Cumulative With Proposed Project								
2014	0.18	0.38	1.1	1.8	0.04	0.04	0.1	0.1
2023	0.26	0.57	1.8	2.8	0.06	0.06	0.2	0.2
2030	0.32	0.71	2.2	3.5	0.07	0.07	0.2	0.2

TABLE 6-35 (Concluded)
Proposed Project and Alternative B Cumulative Scenarios –Contributions to Regional PM2.5 and PM10 Concentrations

Milestone Year	Annual PM2.5 (µg/m³)	Annual PM10 (µg/m³)	Basin Daily PM2.5 (µg/m³)	Basin Daily PM10 (µg/m³)	Coachella Valley Annual PM2.5 (µg/m³)	Coachella Valley Annual PM10 (µg/m³)	Coachella Valley Daily PM2.5 (µg/m³) Basin Annual PM2.5 (µg/m³)	Coachella Valley Daily PM10 (µg/m³)
Cumulative With Alternative B								
2014	0.16	0.34	1.1	1.6	0.03	0.03	0.1	0.1
2023	0.20	0.43	1.6	2.2	0.04	0.04	0.2	0.2
2030	0.22	0.49	2.0	2.5	0.05	0.05	0.2	0.2

c. Cumulative NO2 Concentrations

Table 6-36 shows the contributions to cumulative regional NO2 concentrations from the cumulative scenario with Alternative B compared to the cumulative scenario with the proposed project. As Table 6-36 shows, the cumulative scenario with Alternative B would contribute the same amount or less to regional NO2 concentrations than the cumulative scenario with the proposed project.

TABLE 6-36
Alternative B and the Proposed Project Cumulative Scenarios – Contributions to Regional NO2 Concentrations

Milestone Year	Basin 1-Hour Average NO ₂ (ppb)	Basin Annual Average NO ₂ (ppb)	Coachella 1-Hour Average NO ₂ (ppb)	Coachella 24-Hour Average NO ₂ ^b (ppb)
Cumulative with Proposed Project				
2014	1	0	1	0
2023	2	0	1	0
2030	2	0	1	0
Cumulative with Alternative B				
2014	0	0	0	0
2023	1	0	0	0
2030	1	0	0	0

d. Cumulative SO₂ Concentrations

Table 6-37 shows the contributions to cumulative regional SO₂ concentrations from the cumulative scenario with Alternative B compared to the cumulative scenario with the proposed project. As shown in the table, for most milestone years, the cumulative scenario with Alternative B would contribute roughly the same amount to regional SO₂ concentrations as the cumulative scenario with the proposed project.

TABLE 6-37
Alternative B and the Proposed Project Cumulative Scenarios – Contributions to
Regional SO₂ Concentrations^a

Milestone Year	Basin 1-Hour Average SO₂ (ppb)	Basin 24-Hour Average SO₂ (ppb)	Basin Annual Average SO₂^b (ppb)
Proposed Project			
2014	1	0	0
2023	1	0	0
2030	1	0	0
Alternative B			
2014	1	0	0
2023	1	0	0
2030	1	0	0

^a SO₂ is not measured in the Coachella Valley.

^b Annual average daily SO_x emissions from all point and areas sources are less than 0.04 tons per day, but are rounded up to the nearest whole number.

e. Cumulative CO Concentrations

Table 6-38 shows the contributions to regional CO concentrations in the Basin from the cumulative scenario with Alternative B compared to the cumulative scenario with the proposed project. Table 6-38 shows that the contribution to CO concentrations from the cumulative scenario with Alternative B are equal to the contribution to CO concentrations from the cumulative scenario with the proposed project.

TABLE 6-38
Alternative B and the Proposed Project – Cumulative Scenarios
Contributions to Regional CO Concentrations

Milestone Year	Change in Concentration (ppm)	
	Cumulative With Proposed Project	Cumulative With Alternative B
2014	0.01	0.01
2023	0.02	0.02
2030	0.02	0.02

Localized Criteria Pollutant Concentrations

Tables 4.1-21 and 4.1-22 in Chapter 4 show that the proposed project has the potential to increase localized PM_{2.5} concentrations at sensitive receptors that may be located near future representative facilities. Similarly, Tables 4.1-23 through 4.1-25 show that the proposed project has the potential to increase local NO₂ concentrations at sensitive receptors that may be located near future representative facilities. The analysis of localized criteria pollutant impacts prepared for the proposed project applies to Alternative B for the following reasons. Because most components of Alternative B are identical to the proposed project, the same future representative facilities that would qualify for permits pursuant to Rules 1304 or 1309.1 under the proposed project would qualify for these permits under Alternative B. The same five-year database (2003 through 2008) of permits and pending permits in the SCAQMD's overall permit database that was used to analyze future localized impacts of the proposed project would be applicable to Alternative B. The same Source Classification Codes (SCCs) would be applicable: (1) to assigning stack parameters to emission sources for modeling on the basis of source type; and (2) to estimate chemical speciation of permitted emissions reported as PM and organic gases with respect to particle size composition of PM emissions.

The main difference between Alternative B and the proposed project is that under Alternative B, large businesses would be required to pay fees per pound of pollutant (Table 6-2) that would be offset by the SCAQMD. The fees would then be used to fund emission reduction projects (Table 6-4). Although the emission reduction projects have the potential to reduce the regional effects of Alternative B, such projects would not reduce emissions at the future affected facilities and, therefore, would not be likely to reduce localized criteria pollutant effects from Alternative B to nearby receptors.

3. *Health Effects – Would Alternative B Expose Sensitive Receptors to Substantial Pollutant Concentrations*

Region-wide Emissions of Criteria Pollutants—Alternative B

The analysis of Alternative B includes a comparison of the health impacts resulting from Alternative B to the health impacts of the proposed project. Increases in criteria pollutant emissions may result in potential adverse health effects including the following: cardiovascular, neurological, reproductive and respiratory diseases. Health effects have been evaluated by modeling criteria pollutant concentrations, which can provide information on mortality, hospital admissions, emergency room visits, minors restricted activity days, school absence days, loss of work days, and cases of acute/chronic bronchitis, nonfatal heart attacks and adverse upper/lower respiratory conditions. Table 6-39 shows the estimated health effects from the proposed project and Alternative B as a result of exposures to ozone for the milestone years of the analysis. Similarly, Table 6-40 shows the estimated health effects from Alternative B compared to the proposed project as a result of exposure to PM_{2.5} and PM₁₀ during the milestone years analyzed. The impacts shown in Tables 6-39 and 6-40 represent health benefits foregone beyond the benefits forecasted in the 2007 AQMP Final Socioeconomic Report (SCAQMD, 2007) that could occur if the project and Alternative B were not implemented, nor replaced by other growth.

TABLE 6-39
Proposed Project and Alternative B – Estimated Ozone Health
Impacts – Health Benefits Foregone

Year	Mortality Deaths (People)	Hospital Admissions (People)	Minor Restricted Activity Days (Days)	School Absences (Days)
Proposed Project				
2014	7	42	29,575	31,172
2023	12	71	49,513	52,186
2030	20	122	85,339	89,947
Alternative B				
2014	7	42	29,612	31,211
2023	11	68	47,715	50,292
2030	20	119	83,331	87,830

TABLE 6-40
Proposed Project and Alternative B – Estimated PM_{2.5} and PM₁₀ Health Impacts – Health Benefits Foregone

Year	Mortality Deaths (People)	Acute Bronchitis (People)	Chronic Bronchitis (People)	Non-fatal Heart Attacks (People)	Upper/Lower Respiratory (People)	Emergency Room Visits	Hospital Admissions (People)	Minor Restricted Activity Days	Work Loss (Days)
Proposed Project									
2014	33	59	18	29	1,262	11	13	23,374	4,074
2023	86	155	46	74	3,283	29	34	60,814	10,601
2030	125	224	66	108	4,763	42	50	88,214	15,377
Alternative B									
2014	21	39	11	19	819	7	9	15,176	2,645
2023	48	86	25	41	1,819	16	19	33,692	5,873
2030	65	117	35	56	2,478	22	26	45,900	8,001

The SCAQMD has not developed significance thresholds for the specific health effects identified in Tables 6-39 and 6-40. However, given the magnitude of the health effects foregone compared to health effect conditions in the absence of Alternative B, SCAQMD staff concludes that Alternative B has the potential to generate significant adverse health effects from increased exposures to ozone and particulate matter. Because of the beneficial effects of the emission reduction projects assumed to be implemented using the large business user fees, health effects generated by Alternative B are expected to be significant, but less significant than health effects generated by the proposed project.

Region-wide Emissions of Criteria Pollutants-- Cumulative Effects

The cumulative health impacts analysis includes health effects of Alternative B, plus health effects of the reasonably foreseeable power plant projects and the effects of the additional three years of past sources permitted in reliance on the SCAQMD's internal offset account (2007 through 2009). Table 6-41 shows the estimated health effects from the cumulative scenario with the proposed project compared to the cumulative scenario with Alternative B as a result of exposure to ozone for the milestone years of the analysis. Table 6-42 shows the estimated health effects from the cumulative scenarios with the proposed project compared to the cumulative scenario with Alternative B as a result of exposures to PM_{2.5} and PM₁₀ for the milestone years of the analysis.

TABLE 6-41
Proposed Project and Alternative B –
Estimated Cumulative Ozone Health Impacts

Milestone Year	Mortality Deaths (People)	Hospital Admissions (People)	Minor Restricted Activity Days (Days)	School Absences (Days)
Cumulative With Proposed Project				
2014	9	54	37,662	39,696
2023	15	92	64,780	68,278
2030	24	143	100,213	105,624
Cumulative With Alternative B				
2014	9	54	37,576	39,605
2023	12	72	50,518	53,246
2030	22	131	92,038	97,007

TABLE 6-42
Estimated Cumulative Annual PM2.5 and PM10 Health Impacts

Year	Mortality Deaths (People)	Acute Bronchitis (People)	Chronic Bronchitis (People)	Non-fatal Heart Attacks (People)	Upper/Lower Respiratory (People)	Emergency Room Visits	Hospital Admissions (People)	Minor Restricted Activity Days	Work Loss (Days)
Cumulative With Proposed Project									
2014	102	184	55	89	3,908	34	41	72,384	12,618
2023	152	273	81	132	5,803	51	61	107,476	18,735
2030	189	341	101	164	7,231	63	76	133,938	23,347
Cumulative With Alternative B									
2014	91	164	48	79	3,470	30	36	64,275	11,204
2023	114	205	61	99	4,355	38	46	80,666	14,061
2030	130	233	69	112	4,590	43	52	91,690	15,983

The SCAQMD has not developed specific significance thresholds for cumulative health impacts. Given the magnitude of the cumulative health benefits foregone that would occur if Alternative B were implemented, the contribution to cumulative impacts from Alternative B is concluded to be cumulatively considerable, but less than the proposed project.

Region-wide Emissions of TACs

Basin toxic risks (measured in cancer risk per million person population over a lifetime of exposure) were estimated using the MATES-III modeling platform for 2014, 2023 and 2030 model year simulations. For reference, the MATES-III study for 2008 attributed the cancer risk from stationary sources, which include industries, and businesses such as dry cleaners and chrome plating operations at approximately 51 additional cancers in a population of one million individuals, whereas total regional cancer risk from toxic air contaminants was 853 in one million. Under conditions with or without the project, toxic risks are expected to decrease in future years. Table 6-43 shows the region-wide project-specific cancer risk and cancer burden reductions foregone beyond those anticipated in the 2007 AQMP, if Alternative B or the proposed project were implemented, as compared to conditions without the project. Table 6-43 also shows the contribution to cancer risk and cancer burden from the cumulative scenario with Alternative B and from the cumulative scenario with the proposed project.

TABLE 6-43
Proposed Project and Alternative B – Cancer Risk and Cancer
Burden Impacts (Project-specific and Cumulative)

Year	Cancer Risk Reduction Not Achieved ^a	Cumulative Cancer Risk Reduction Not Achieved ^a	Cancer Burden Reductions Not Achieved	Cumulative Cancer Burden Reductions Not Achieved
Proposed Project				
2014	0.91	3.35	16	59
2023	2.86	5.15	54	96
2030	4.4	6.59	86	129
Alternative B				
2014	0.22	2.68	4	47
2023	0.52	2.80	10	52
2030	0.78	2.97	15	58

^a Additional cases of cancer in a population of one million individuals.

As shown in Table 6-43, neither the proposed project nor Alternative B would generate project-specific or cumulative cancer risk impacts that exceed the SCAQMD's cancer risk significance threshold of 10 in one million (10×10^{-6}).

The proposed project and Alternative B would result in a cancer burden impacts that exceed the SCAQMD's significance threshold of 0.5. Compared to the without project

scenario, the proposed project would create an increased project-specific cancer burden impact in the year 2030 of 87. Alternative B would create an increased project-specific cancer burden impact in the year 2030 of 16. In addition, the cumulative scenarios with both the proposed project and with Alternative B result in significant cancer burdens compared to the without project scenarios. The contributions to cumulative cancer burden impacts from Alternative B are considered to be cumulatively considerable but less than the proposed project.

A hazard index (HI) is a summation of the hazard (non-cancer) quotients for all chemicals to which an individual is exposed. A hazard index can be measured as a result of chronic (long-term) exposure or acute (short-term) exposure. SCAQMD's significance threshold for non-cancer chronic or acute HI value is 1.0 because if the HI is less than 1.0, it is presumed that no significant adverse human health effects (non-cancer) are expected to occur. Table 6-44 shows the population-weighted project-specific change in chronic HI between conditions without the project and the proposed project and between conditions without the project and Alternative B. Table 6-44 also shows the changes between conditions without the project and cumulative scenarios with the proposed project and with Alternative B.

Table 6-44
Proposed Project and Alternative B – Chronic and Acute Health
Impacts (Project-specific and Cumulative)

Year	Chronic Health Index Not Achieved	Cumulative Chronic Health Index Not Achieved	Acute Health Index Not Achieved	Cumulative Acute Health Index Not Achieved
Proposed Project				
2014	0.0	0.02	0.02	0.06
2023	0.02	0.03	0.05	0.09
2030	0.02	0.03	0.08	0.11
Alternative B				
2014	0	0.01	0.01	0.05
2023	0	0.01	0.01	0.05
2030	0	0.02	0.02	0.05

As shown in Table 6-44, neither the proposed project nor Alternative B would exceed the SCAQMD's acute or chronic HI significance threshold of 1.0. Similarly, Table 6-44 shows that cumulative acute and chronic HI impacts from the proposed project with the cumulative scenario and Alternative B with the cumulative scenario would not exceed

the HI significance threshold. Therefore, neither the proposed project nor Alternative B would generate project-specific or cumulative non-cancer health risk impacts, while impacts from Alternative B would be equivalent to or less than the proposed project.

Localized Emissions of TACs

Under Alternative B, sources permitted under Rules 1304 and 1309.1 would be subject to the requirements in Rules 1401 and 1402 that limit the cancer risk and non-cancer hazard level, which would limit any potential significant toxic impact from each source. The thresholds in Rule 1401 are the same as the SCAQMD's CEQA significance thresholds for toxics. As a result of these regulatory prohibitions, the issuance of a permit by the SCAQMD to a stationary source of TACs would not result in stationary source emissions that exceed the CEQA significance thresholds for localized health impacts. However, the thresholds contained in Rule 1401 are applied on a permit-unit basis; as a result, a facility with multiple permitted sources could still exceed the Hazard Index limits in Rule 1401. Such facilities would instead be subject to Rule 1402; under that rule, the allowable cancer burden is the same as under Rule 1401, but the Hazard Index limits for acute and chronic non-cancer toxic impacts are higher (3.0) than the limits under Rule 1401 and thus higher than the applicable CEQA significance thresholds. Therefore, the localized air toxic impacts of the proposed project are considered significant.

The main difference between Alternative B and the proposed project is that under Alternative B, large businesses would be required to pay fees per pound of pollutant (Table 6-4) that would be offset by the SCAQMD. The fees would then be used to fund emission reduction projects (Table 6-7). Although the emission reduction projects have the potential to reduce the regional effects of Alternative B (Table 6-25), such projects would not reduce TAC emissions at the future affected facilities and, therefore, would not be likely to reduce localized effects from TACs. Therefore, Alternative B has the potential to generate adverse localized impacts from emissions of TACs equivalent to the significant impacts of the proposed project.

4 Odors – Would Alternative B Create Objectionable Odors Affecting a Substantial Number of People

Some equipment permitted under Rules 1304 and 1309.1 could create objectionable odors, as explained in subchapter 4.1. Evaluation of permit applications includes the imposition of conditions to minimize such odors. In addition, installing BACT equipment would typically contribute to a reduction in potential odor impacts. Further, SCAQMD Rule 402 prohibits operation of a facility that creates an odor nuisance. Nevertheless, as explained in subchapter 4.1, facilities containing sources receiving permits under the proposed project could result in significant odor impacts. Alternative B could result in the same types of facilities as the proposed project; and therefore would have the same potential to result in significant odor impacts. Emission reduction projects funded by offset user fees under Alternative B could reduce odors (e.g.,

replacing diesel engines with alternative technology), but such reductions would not be expected to occur at the same facilities as those with sources receiving permits under proposed Rule 1315.

Visibility Impacts

- 5. Visibility. Would the Alternative B create significant aesthetic impacts by resulting in air emissions that substantially degrade the existing visual character or quality of the project surroundings?**

Alternative B Effects

Table 6-45 shows predicted visibility and visual range impacts from Alternative B and the proposed project with respect to the state standard. The state standard is a light extinction coefficient of 0.23 per kilometer when relative humidity is less than 70 percent (roughly equivalent to a 10-mile visual range), over an 8-hour averaging period (10 am – 6 pm, PST). Visual range (measured in miles) is provided for informational purposes. The range of without project values for the extinction coefficient predicted for the eastern Basin represented by Riverside-Rubidoux (the worst case) is from 0.063 to 0.067 from 2014 to 2030 over the project timeframe, or one-third of the California standard. The maximum predicted impact on the light extinction coefficient ($.001 \text{ km}^{-1}$) attributable to the proposed project would not cause or contribute to a violation of the state standard and is not significant. As shown in Table 6-45, visual range impacts for Alternative B are less than or equal to the proposed project and, therefore, are also concluded to be less than significant.

TABLE 6-45
Proposed Project and Alternative B – Visibility Impacts at Riverside-Rubidoux
Measured in Extinction Coefficient and Visual Range (miles)

	Predicted Extinction Coefficient Without the Project (km^{-1})	Impact on Extinction Coefficient		Visual Range Without Project (miles)	Difference in Miles	
Milestone Year		Proposed Project	Alternative B		Proposed Project	Alternative B
2014	0.0672	0.0002	0.0001	36.512	-0.091	-0.059
2023	0.0629	0.0005	0.0003	39.290	-0.274	-0.152
2030	0.0656	0.0008	0.0004	37.633	-0.469	-0.244

The deciview – an index which incorporates incremental changes in people’s perception of visibility is directly used as the metric for visibility assessment in the federal Regional

Haze visibility standard. A 0.5 deciview change is used to assess significance in Class I wilderness areas. Table 6-46 summarizes the visibility effects of Alternative B and the visibility effects of the proposed project in terms of deciview changes.

TABLE 6-46
Proposed Project and Alternative B – Visibility Impacts at Class-I Wilderness Areas
Measured in Deciview and Visual Range (miles)

Milestone Year Area Impacted	Predicted Deciview Value Without Project	Total Impact (Difference in Deciviews)		Predicted Visual Range Without Project (miles)	Predicted Visual Range With Project (miles)	
		Proposed Project	Alternative B		Proposed Project	Alternative B
2014						
Agua Tibia	17.709	0.007	0.005	41.463	0.022	-0.019
San Gabriel	16.566	0.014	0.009	49.529	0.058	-0.042
Cucamonga	16.032	0.012	0.008	50.620	0.049	-0.039
San Gorgonio	13.037	0.006	0.004	67.717	0.023	-0.024
San Jacinto	13.964	0.006	0.004	60.644	0.02	-0.026
Joshua Tree	11.251	0.005	0.003	90.694	0.017	-0.022
2023						
Agua Tibia	17.699	0.02	0.011	41.497	-0.081	-0.045
San Gabriel	16.262	0.042	0.023	50.709	-0.194	-0.107
Cucamonga	15.732	0.03	0.017	51.881	-0.147	-0.081
San Gorgonio	12.986	0.018	0.01	67.866	-0.114	-0.063
San Jacinto	13.940	0.014	0.008	60.735	-0.086	-0.048
Joshua Tree	11.297	0.005	0.006	90.396	-0.075	-0.042
2030						
Agua Tibia	17.781	0.022	0.011	41.161	-0.088	-0.046
San Gabriel	16.321	0.058	0.03	50.405	-0.265	-0.138
Cucamonga	15.865	0.049	0.025	51.224	-0.243	-0.126
San Gorgonio	13.124	0.023	0.012	67.006	-0.138	-0.072
San Jacinto	14.056	0.020	0.01	60.075	-0.119	-0.062
Joshua Tree	11.378	0.017	0.009	89.893	-0.108	-0.056

As shown in Table 6-46, the maximum impact projected for the proposed project measured in deciviews would be less than 0.06 for all locations and milestone years, which is not significant. Similarly, implementing Alternative B would also generate a

maximum impact measured in deciviews that would be less than 0.03 for all locations and milestone years, which is not significant. Further, visibility impacts from Alternative B would be less than visibility impacts from the proposed project.

Cumulative Effects

The cumulative visibility impacts analysis includes effects of Alternative B, plus effects of the reasonably foreseeable power plant projects and the additional three years of past sources receiving permits in reliance upon the SCAQMD's offset accounts (2007 through 2009). Table 6-47 presents the visibility effects of the cumulative scenario with Alternative B and the visibility effects of the cumulative scenario with the proposed project. The maximum predicted impact on the light extinction coefficient ($.001 \text{ km}^{-1}$) attributable to the cumulative scenario with the proposed project would not cause or contribute to a violation of the state standard and would not be significant. Neither Alternative B nor the proposed project would make a cumulatively considerable contribution to a significant cumulative visibility impact. Visibility impacts from Alternative B would be less for all years and locations than for the proposed project.

TABLE 6-47
**Proposed Project and Alternative B – Cumulative Visibility Impacts at Riverside-
Rubidoux Measured in Deciview and Visual Range (miles)**

	Predicted Extinction Coefficient Without the Project (km^{-1})	Impact on Extinction Coefficient		Visual Range Without Project (miles)	Difference in Miles	
Milestone Year		Cumulative with Proposed Project	Cumulative with Alternative B		Cumulative with Proposed Project	Cumulative with Alternative B
2014	0.0672	0.0003	0.0003	36.512	-0.170	-0.130
2023	0.0629	0.0008	0.0006	39.290	-0.456	-0.328
2030	0.0656	0.0008	0.0005	37.633	-0.469	-0.306

The cumulative visibility impacts analysis for class I wilderness areas includes effects of Alternative B, plus effects of the reasonably foreseeable power plant projects, and the additional three years of sources receiving permits in reliance upon the SCAQMD's offset accounts (2007 through 2009). Table 6-48 shows the visibility effects for class I wilderness areas of the cumulative scenario with Alternative B and the visibility effects of the cumulative scenario with the proposed project in terms of deciview changes. Under the federal standard, a 0.5 deciview change would be considered a significant adverse impact and a cumulatively considerable contribution to a significant cumulative

impact. Neither Alternative B nor the proposed project would make a cumulatively considerable contribution to a significant cumulative visibility impact.

TABLE 6-48
Proposed Project and Alternative B – Cumulative Visibility Impacts at Class-I
Wilderness Areas Measured in Deciview and Visual Range (miles)

Milestone Year Area Impacted	Predicted Deciview Value Without Project	Total Project Impact (Difference in Deciviews)		Predicted Visual Range Without Project (miles)	Predicted Visual Range Without Project (miles)	
2014		Cumulative with Proposed Project	Cumulative with Alternative B		Cumulative with Proposed Project	Cumulative with Alternative B
Agua Tibia	17.709	0.011	0.01	41.463	-0.044	-0.038
San Gabriel	16.566	0.024	0.021	49.529	-0.108	-0.094
Cucamonga	16.032	0.021	0.018	50.620	-0.101	-0.088
San Gorgonio	13.037	0.012	0.01	67.717	-0.072	-0.063
San Jacinto	13.964	0.009	0.008	60.644	-0.059	-0.051
Joshua Tree	11.251	0.008	0.007	90.694	-0.056	-0.049
2023		Cumulative with Proposed Project	Cumulative with Alternative B		Cumulative with Proposed Project	Cumulative with Alternative B
Agua Tibia	17.699	0.023	0.017	41.497	-0.094	-0.068
San Gabriel	16.262	0.053	0.038	50.709	-0.239	-0.172
Cucamonga	15.732	0.036	0.026	51.881	-0.178	-0.128
San Gorgonio	12.986	0.022	0.016	67.866	-0.139	-0.1
San Jacinto	13.940	0.017	0.012	60.735	-0.105	-0.075
Joshua Tree	11.297	0.014	0.01	90.396	-0.092	-0.066
2030		Cumulative with Proposed Project	Cumulative with Alternative B		Cumulative with Proposed Project	Cumulative with Alternative B
Agua Tibia	17.781	0.025	0.016	41.161	-0.101	-0.066
San Gabriel	16.321	0.066	0.043	50.405	-0.304	-0.198
Cucamonga	15.865	0.057	0.037	51.224	-0.282	-0.184
San Gorgonio	13.124	0.027	0.018	67.006	-0.161	-0.105
San Jacinto	14.056	0.022	0.014	60.075	-0.134	-0.087
Joshua Tree	11.378	0.02	0.013	89.893	-0.125	-0.082

Climate Change

6. Greenhouse Gas Emissions – Would Alternative B result in greenhouse gas emissions that may have a significant impact on the environment, based on any applicable threshold of significance?

The methodology for deriving GHG emission impacts for the project alternatives is the same methodology used for the proposed project, which makes two assumptions. First, SOx emissions were selected as a surrogate to prorate the GHG emissions because SOx emissions result primarily from sulfur contained in fossil fuels. Using a ratio of GHG emissions to SOx emissions from the AQMP inventory, the GHG emissions from the proposed project and project alternatives are calculated using the estimated SOx emissions from the proposed project and multiplying by the ratio factor (see subchapter 4.0 and Appendix D).

Second, an analysis of the statewide inventory was conducted to determine the impact from the remaining GHG pollutants, including HFCs, PFCs and SF6. Combustion GHG emissions are proportional to SOx emissions, while emissions of HFCs, PFCs and SF6 are analyzed as proportional to emissions of CO₂, CH₄ and N₂O, based on the statewide inventory. (See Subchapter 4.0 for additional discussion of the methodology for calculating GHG emissions.). Table 6-49 lists the total GHG emissions from all six GHG pollutants attributed to Alternative B, as well as the GHG emissions attributed to the proposed project.

TABLE 6-49
Proposed Project and Alternative B – SOx and Greenhouse Gas Emissions

Milestone Year	SOx Emissions (tons/day)	SOx Emissions (tons/year)	CO₂, CH₄ & N₂O Emissions (million MT CO₂ eq/year)	HFCs, PFCs and SF₆ Emissions^a (million MT CO₂eq/year)	TOTAL GHG Emissions^b (million MT CO₂eq/year)
Proposed Project					
2014	0.16	58.4	4.52	0.29	4.81
2023	0.49	178.85	13.83	0.90	14.74
2030	0.74	270.1	20.89	1.36	22.26
Alternative B					
2014	0.11	40.15	3.11	0.20	3.31
2023	0.35	127.75	9.88	0.64	10.52
2030	0.51	186.15	14.40	0.94	15.33

^a Calculated based on ratio of 0.065 of high GWP/total GHGs. Thus, CO₂, CH₄ and N₂O Emissions x 0.065 = HFCs, PFCs and SF₆ emissions (for example, 4.52 million MT CO₂ eq/year x 0.065 = 0.29 million MT CO₂ eq/year)

^b Total GHG emissions = CO₂, CH₄ and N₂O Emissions + HFCs, PFCs and SF₆ emissions. Total GHG emissions may not be exact due to rounding.

SCAQMD's adopted Tier 3 GHG significance threshold for SCAQMD lead agency projects is 10,000 MT CO₂eq per year. Projects with incremental increases below this threshold are not considered to be cumulatively considerable. As shown in Table 6-41, potential GHG emissions from Alternative B exceed 10,000 MT CO₂eq per year for the milestone years of 2023 and 2030 and are concluded to be significant, but less than the GHG emissions from the proposed project. Therefore, GHG emissions from Alternative B are considered to be cumulatively considerable (CEQA Guidelines §15065(a)(3)) and, would contribute to significant adverse climate change impacts.

Cumulative Effects

The cumulative analysis includes GHG emissions from Alternative B, plus GHG emissions from the reasonably foreseeable power plant projects, and the additional three years of sources receiving permits in reliance upon the district's offset accounts (2007 through 2009). Table 6-50 presents the GHG emissions from the cumulative scenario with Alternative B and the GHG emissions from the cumulative scenario with the proposed project.

TABLE 6-50
Proposed Project and Alternative B – Cumulative Greenhouse Gas Emissions

Attainment Year Periods	TOTAL GHG Emissions (million MT CO₂ eq /year)
Cumulative With Proposed Project	
2007-2014	11.98
2007-2023	21.61
2007-2030	29.13
Cumulative With Alternative B	
2007-2014	10.55
2007-2023	17.70
2007-2030	22.21

As explained above, cumulative GHG emissions from Alternative B are considered to be cumulatively considerable and, therefore, would contribute to significant adverse climate change impacts.

Alternative C- Large Businesses Prohibited from Accessing Rule 1304 Exemptions

1. ***AQMP Consistency – Would Alternative C Conflict with or Obstruct the Implementation of an Applicable Air Quality Plan?***

Like the proposed project, Alternative C would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. Although the AQMP provides strategies for attaining and maintaining the NAAQSs and CAAQSs, it is considered to be a growth accommodating document. Alternative C would allow the use of offsets up to the cap that is based on 2007 AQMP growth projections cap for the relevant industry categories. However, Alternative C would not allow large businesses (those that do not qualify as small businesses under SCAQMD Rule 102) to access the SCAQMD's internal offset accounts.

Emissions from Alternative C are not expected to conflict with or obstruct the implementation of the AQMP because offsets cannot be issued above emissions caps, which are based on growth projections of the 2007 AQMP for the relevant industry categories. Because regional criteria pollutant emissions from Alternative C are expected to be less than the regional criteria pollutant emissions from the proposed project, the potential for conflicts with the 2007 AQMP would be even less likely.

2. ***Criteria Pollutant Emission Standards – Would Alternative C Violate any Air Quality Standard or Contribute to an Existing or Projected Air Quality Violation***

a. ***Alternative C Effects – Regional Mass Criteria Pollutant Emissions***

The primary difference between the proposed project and Alternative C is that under Alternative C large businesses would be prohibited from obtaining exemptions from offset requirements pursuant to Rules 1304 and 1309.1. The following analysis of impacts from Alternative C, identifies emissions from large businesses based upon historical permit data. To calculate the emission effects from Alternative C, the anticipated future increase in emissions from large businesses are subtracted from the emissions projected for the proposed project. Table 6-51 shows the relative magnitude of potentially significant adverse impacts from Alternative C compared to the proposed project. Table 6-51 shows emissions from the proposed project, the subset of emissions attributed to large businesses, and the resulting emissions from Alternative C. Under Alternative C, mass emissions of criteria pollutants would be significant, but would be less than the significant emissions projected for the proposed project.

TABLE 6-51
Proposed Project and Alternative C Stationary Source Emissions

Milestone Years	Pollutant					
	VOC	NO _x	SO _x	CO	PM ₁₀	PM _{2.5}
Proposed Project - Tons per Day						
2014	16.99	1.29	0.16	1.14	0.85	0.54
2023	34.52	2.38	0.49	4.16	2.84	1.8
2030	44.59	3.31	0.74	6.26	4.44	2.82
Proposed Project - Pounds per Day						
2014	33,980	2,580	320	2,280	1,700	1,080
2023	69,040	4,760	980	8,320	5,680	3,600
2030	89,180	6,620	1,480	12,520	8,880	5,640
Large Business Emissions – Tons per Day						
2014	1.39	0.12	0.03	0.04	0.09	0.06
2023	4.55	0.31	0.09	0.39	0.31	0.2
2030	6.97	0.52	0.15	0.68	0.48	0.31
Large Business Emissions – Pounds per Day						
2014	2,780	240	60	80	180	120
2023	9,100	620	180	780	620	400
2030	13,940	1,040	300	1,360	960	620
Alternative C - Tons per Day						
2014	15.61	1.17	0.13	1.1	0.76	0.48
2023	29.98	2.07	0.4	3.77	2.53	1.61
2030	37.63	2.79	0.59	5.57	3.96	2.51
Alternative C Pounds per day						
2014	31,220	2,340	260	2,200	1,520	960
2023	59,960	4,140	800	7,540	5,060	3,200
2030	75,260	5,580	1,180	11,430	7,920	5,020
Regional Significance Thresholds (Pounds per Day)						
Significance Threshold	55	55	150	550	150	55
Significant?	Yes	Yes	Yes	Yes	Yes	Yes

Sums may not be exact due to rounding.

As indicated in Subchapter 4.1, SCAQMD staff determined that total lead emissions in the district are approximately 18 lbs/day (6,517 lbs/yr) based on fiscal year (FY) 2006-2007 data comprised of 566 facilities in the Basin that reported lead emissions. Lead emission impacts were calculated for the same milestone years evaluated for other emission impacts. As shown in Table 6-52, the maximum net increase in lead emissions by 2030 in the Basin from the proposed project and the cumulative scenario with the proposed project would not exceed the SCAQMD's mass daily significance threshold for lead of three pounds per day. Similarly, Table 6-52 shows that lead emission impacts from Alternative C and from the cumulative scenario with Alternative C would be less-than-significant.

TABLE 6-52
Proposed Project and Alternative C –
Project-Specific and Cumulative Lead Emissions

Milestone Years	Lead (lbs/day)			
	Proposed Project	Cumulative With Proposed Project	Alternative C	Cumulative With Alternative C
2014	0.13	0.33	0.12	0.32
2023	0.45	0.50	0.40	0.47
2030	0.70	0.63 ²	0.62	0.58

Cumulative Effects

As explained in Chapters 4.0 and 4.1, the cumulative impact analysis includes emissions from sources permitted under Rules 1304 and 1309.1 pursuant to prior version of Rule 1315 and SB 827. In addition, the cumulative impacts analysis includes emissions from three power plants.

Table 6-53 shows the total mass emissions from stationary sources under Alternative C, plus the other sources included in the cumulative scenario. Based on the data shown in Table 6-53, cumulative impacts from Alternative C would be significant, but less significant than the proposed project. Further, based on the emissions shown in Table 6-53, Alternative C's contribution to cumulative impacts is considered to be cumulatively considerable.

² For lead emitting facilities, in the early years of the analysis there were some SIC facility categories with negative growth factors, resulting in lower overall lead emissions. Based on this factor, the cumulative net increase in lead emissions was determined to be lower than the proposed project because it included more years of negative growth.

TABLE 6-53
Proposed Project and Alternative C Cumulative Stationary Source Mass Emissions

Milestone Years	Pollutant					
	VOC	NO _x	SO _x	CO	PM ₁₀	PM _{2.5}
	Cumulative With Proposed Project – Tons per Day					
2014	23.71	4.7	0.47	10.82	3.47	2.87
2023	40.76	5.64	0.79	14.36	5.29	4.02
2030	50.74	6.61	1.04	16.55	6.79	4.97
Cumulative With Proposed Project Pounds per Day						
2014	47,420	9,400	940	21,640	6,940	5,740
2023	81,520	11,280	1,580	28,720	10,580	8,040
2030	101,480	13,220	2,080	33,100	13,580	9,940
Cumulative With Alternative C Tons per Day						
2014	22.32	4.58	0.44	10.78	3.38	2.81
2023	36.22	5.34	0.70	13.97	4.98	3.82
2030	43.77	6.09	0.89	15.86	6.30	4.67
Cumulative With Alternative C Pounds per day						
2014	44,640	9,160	880	21,560	6,760	5,620
2023	72,440	10,680	1,400	27,940	9,960	7,640
2030	87,540	12,180	1,780	31,720	12,600	9,340
Regional Significance Thresholds Pounds per Day						
Significance Threshold	55	55	150	550	150	55
Significant?	Yes	Yes	Yes	Yes	Yes	Yes

Modeled Concentrations of Criteria Pollutants

Regional Criteria Pollutant Concentrations – Alternative C

a. Ozone Concentrations

In addition to analyzing project-specific effects of Alternative C in terms of mass emissions of criteria pollutants, this PEA includes a supplemental analysis of the contribution of Alternative C to regional pollutant concentrations.

Air quality is expected to improve under future conditions, with or without the proposed project or alternatives. As shown in the Table 6-54, for most milestone years, Alternative C would contribute less to ozone concentrations than the proposed project. Another way of looking at the results in Table 6-54 is that for most years, Basin and Coachella Valley ozone concentration improvements foregone from Alternative C are equal to or less than the proposed project.

TABLE 6-54
Proposed Project and Alternative C – Contribution to Regional Ozone Concentrations
(Peak 8-hour concentrations)

Year	Basin Average Ozone (ppb)	Basin Maximum Station Ozone (ppb)	Coachella Valley Average Ozone (ppb)	Coachella Valley Maximum Station Ozone (ppb)
Proposed Project				
2014	0.9	1.4	0.5	0.6
2023	1.5	1.9	0.8	1.1
2030	2.6	2.9	1.1	1.3
Alternative C				
2014	0.8	1.3	0.5	0.5
2023	1.3	1.6	0.8	0.9
2030	2.3	2.5	1.0	1.1

b. Particulate Matter Concentrations

Table 6-55 shows the contribution of emissions from Alternative C to the predicted annual average and 24-hour (daily) average Basin and Coachella Valley PM_{2.5} and PM₁₀ concentrations estimated for the milestone years of 2014, 2023 and 2030 compared to the proposed project. As shown in the table, for most milestone years, Alternative C contributes less to regional concentrations of particulate matter than the proposed project. Another way of looking at the results in Table 6-55 is that for most years Basin and Coachella Valley predicted annual average and 24-hour average Basin and Coachella Valley PM_{2.5} and PM₁₀ concentration improvements foregone from Alternative C are equal to or slightly less than the proposed project.

TABLE 6-55
Proposed Project and Alternative C – Contributions to Regional PM2.5
and PM10 Concentrations

Year	Basin Annual PM2.5 (µg/m³)	Basin Annual PM10 (µg/m³)	Basin Daily PM2.5 (µg/m³)	Basin Daily PM10 (µg/m³)	Coachella Valley Annual PM2.5 (µg/m³)	Coachella Valley Annual PM10 (µg/m³)	Coachella Valley Daily PM2.5 (µg/m³)	Coachella Valley Daily PM10 (µg/m³)
Proposed Project								
2014	0.06	0.12	0.6	0.7	0.01	0.01	0.1	0.1
2023	0.15	0.32	1.2	1.8	0.03	0.03	0.1	0.1
2030	0.21	0.47	1.6	2.5	0.05	0.05	0.2	0.2
Alternative C								
2014	0.05	0.11	0.5	0.7	0.01	0.01	0.1	0.1
2023	0.13	0.28	1.1	1.6	0.03	0.03	0.1	0.1
2030	0.18	0.4	1.4	2.2	0.04	0.04	0.1	0.1

c. NO2 Concentrations

Table 6-56 shows the contribution to regional NO2 concentrations from Alternative C compared to the proposed project. The regional NO2 concentration analysis is based on an emissions-weighted approach to estimate the incremental contributions of NO2 from Alternative C. As Table 6-56 shows, Alternative C and the proposed project would result in NO2 concentrations of 1.0 ppb or less for all milestone years, regardless of the averaging time.

TABLE 6-56
Alternative C and the Proposed Project – Contributions to Regional NO2
Concentrations

Milestone Year	Basin 1-Hour Average NO₂ (ppb)	Basin Annual Average NO₂ (ppb)	Coachella 1-Hour Average NO₂ (ppb)	Coachella 24-Hour Average NO₂^b (ppb)
Proposed Project				
2014	0	0	0	0
2023	1	0	0	0
2030	1	0	0	0

TABLE 6-56 (Concluded)
Alternative C and the Proposed Project – Contributions to Regional NO₂ Concentrations

Milestone Year	Basin 1-Hour Average NO₂ (ppb)	Basin Annual Average NO₂ (ppb)	Coachella 1-Hour Average NO₂ (ppb)	Coachella 24-Hour Average NO₂^b (ppb)
Alternative C				
2014	0	0	0	0
2023	1	0	0	0
2030	1	0	0	0

d. SO₂ Concentrations

Table 6-57 shows the contributions to regional SO₂ concentrations from Alternative C compared to the proposed project. The regional SO₂ concentration analysis is also based on an emissions-weighted approach to estimate the incremental increased contributions of SO₂ from Alternative C. Both Alternative C and the proposed project would result in contributions to SO₂ concentrations in the Basin of 0.04 ton per day or less, which is less than 0.1 percent of the Basin SO_x emissions, and less than 1.0 ppb for all milestone years, regardless of the averaging time. SO₂ is not measured in the Coachella Valley because there are so few SO₂ emissions sources.

TABLE 6-57
Alternative C and the Proposed Project – Contributions to Regional SO₂ Concentrations^a

Milestone Year	Basin 1-Hour Average SO₂ (ppb)	Basin 24-Hour Average SO₂ (ppb)	Basin Annual Average SO₂^b (ppb)
Proposed Project			
2014	1	0	0
2023	1	0	0
2030	1	0	0
Alternative C			
2014	0	0	0
2023	1	0	0
2030	1	0	0

^a SO₂ is not measured in the Coachella Valley.

^b Annual average daily SO_x emissions from all point and areas sources are less than 0.04 tons per day, but are rounded up to the nearest whole number.

e. CO Concentrations

Ambient concentrations of carbon monoxide respond linearly to changes in the emissions inventory. Table 6-58 shows contributions to ambient CO concentrations in the Basin from Alternative C compared to the proposed project. Table 6-58 shows that contributions to CO concentrations from Alternative C are not noticeably lower than concentrations from the proposed project.

TABLE 6-58
Alternative C and the Proposed Project –
Contributions to Regional CO Concentrations

Milestone Year	Change in Concentration (ppm)	
	Proposed Project	Alternative C
2014	0.00	0.00
2023	0.01	0.01
2030	0.01	0.01

Regional Criteria Pollutant Concentrations-- Cumulative Effects

a. Cumulative Ozone Concentrations

In addition to analyzing project-specific contributions of Alternative C to regional pollutant concentrations, this PEA includes an analysis of the combined contributions to regional pollutant concentrations from Alternative C plus other sources receiving permits in reliance upon the SCAQMD's internal offset accounts. Table 6-59 shows the contribution to regional ozone concentrations from such sources in the Basin and Coachella Valley in terms of the ozone concentrations for the cumulative scenario with Alternative C compared to the cumulative scenario with the proposed project. As shown in the table, for most milestone years, the cumulative scenario with Alternative C results in less contribution to regional ozone concentrations than the cumulative scenario with proposed project.

TABLE 6-59
Proposed Project and Alternative C Cumulative Scenarios -
Contributions to Regional Ozone Concentrations
(Peak 8-hour Concentrations)

Year	Basin Average Ozone (ppb)	Basin Maximum Station Ozone (ppb)	Coachella Valley Average Ozone (ppb)	Coachella Valley Maximum Station Ozone (ppb)
Cumulative With Proposed Project				
2014	1.1	1.8	0.8	0.8
2023	2.0	2.5	1.0	1.3
2030	3.0	3.5	1.3	1.6
Cumulative With Alternative C				
2014	1.1	1.7	0.7	0.7
2023	1.6	1.7	0.7	0.8
2030	2.6	2.6	0.8	0.9

b. Cumulative Particulate Matter Concentrations

Table 6-60 shows the predicted contribution of regional particulate matter concentrations from Alternative C with the cumulative scenario compared to the proposed project with the cumulative scenario in terms of the contributions to the predicted annual average and 24-hour (daily) average Basin and Coachella Valley PM_{2.5} and PM₁₀ concentrations estimated for the milestone years of 2014, 2023 and 2030. As shown in the table, the cumulative scenario with Alternative C would contribute less to regional particulate matter concentrations than the cumulative scenario with proposed project.

c. Cumulative NO₂ Concentrations

Table 6-61 shows the contributions to cumulative regional NO₂ concentrations from the cumulative scenario with Alternative C compared to the cumulative scenario with the proposed project. As Table 6-61 shows, the cumulative scenario with Alternative C would contribute the same amount or less to regional NO₂ concentrations than the cumulative scenario with proposed project.

TABLE 6-60
Proposed Project and Alternative C Cumulative Scenarios –
Contributions to Regional PM2.5 and PM10 Concentrations

Year	Basin Annual PM2.5 (µg/m³)	Basin Annual PM10 (µg/m³)	Basin Daily PM2.5 (µg/m³)	Basin Daily PM10 (µg/m³)	Coachella Valley Annual PM2.5 (µg/m³)	Coachella Valley Annual PM10 (µg/m³)	Coachella Valley Daily PM2.5 (µg/m³)	Coachella Valley Daily PM10 (µg/m³)
Cumulative With Proposed Project								
2014	0.18	0.38	1.1	1.8	0.04	0.04	0.1	0.1
2023	0.26	0.57	1.8	2.8	0.06	0.06	0.2	0.2
2030	0.32	0.71	2.2	3.5	0.07	0.07	0.2	0.2
Cumulative With Alternative C								
2014	0.17	0.37	1.1	1.7	0.04	0.04	0.1	0.1
2023	0.24	0.53	1.6	2.6	0.05	0.05	0.2	0.2
2030	0.29	0.64	1.9	3.1	0.06	0.06	0.2	0.2

TABLE 6-61
Alternative C and the Proposed Project Cumulative Scenarios –
Contributions to Regional NO2 Concentrations

Milestone Year	Basin 1-Hour Average NO₂ (ppb)	Basin Annual Average NO₂ (ppb)	Coachella 1-Hour Average NO₂ (ppb)	Coachella 24-Hour Average NO₂ (ppb)
Proposed Project				
2014	1	0	1	0
2023	2	0	1	0
2030	2	0	1	0
Alternative C				
2014	1	0	1	0
2023	1	0	1	0
2030	2	0	1	0

d. Cumulative SO2 Concentrations

Table 6-62 shows the contributions to cumulative regional SO2 concentrations foregone from the cumulative scenario with Alternative C compared to the cumulative scenario with the proposed project. As shown in the table, for most milestone years, the

cumulative scenario with Alternative C would contribute roughly the same amount to regional SO₂ concentrations as the cumulative scenario with the proposed project.

TABLE 6-62
Alternative C and the Proposed Project Cumulative Scenarios –
Contributions to Regional SO₂ Concentrations^a

Milestone Year	Basin 1-Hour Average SO ₂ (ppb)	Basin 24-Hour Average SO ₂ (ppb)	Basin Annual Average SO ₂ ^b (ppb)
Proposed Project			
2014	1	0	0
2023	1	0	0
2030	1	0	0
Alternative C			
2014	1	0	0
2023	1	0	0
2030	1	0	0

^a SO₂ is not measured in the Coachella Valley.

^b Annual average daily SO_x emissions from all point and areas sources are less than 0.04 tons per day, but are rounded up to the nearest whole number.

e. Cumulative CO Concentrations

Table 6-63 shows the contributions to CO concentrations in the Basin from the cumulative scenario with Alternative C compared to the proposed project. Table 6-63 shows that the contribution to CO concentrations from Alternative C are not noticeably lower than the contribution to CO concentrations from the cumulative scenario with the proposed project.

TABLE 6-63
Alternative C and the Proposed Project – Cumulative Scenarios
Contributions to Regional CO Concentrations

Milestone Year	Change in Concentration (ppm)	
	Cumulative With Proposed Project	Cumulative With Alternative C
2014	0.01	0.01
2023	0.02	0.02
2030	0.02	0.02

Localized Criteria Pollutant Concentrations

Tables 4.1-21 and 4.1-22 in Chapter 4 show that the proposed project has the potential to increase localized PM_{2.5} concentrations at sensitive receptors that may be located near future representative facilities. Similarly, Tables 4.1-23 through 4.1-25 show that the proposed project has the potential to increase local NO₂ concentrations at sensitive receptors that may be located near future representative facilities. The analysis of project-specific localized criteria pollutant impacts prepared for the proposed project applies to Alternative C for the following reasons. Because most components of Alternative C are identical to the proposed project, the same future representative facilities that would qualify for these permits pursuant to Rules 1304 or 1309.1 under the proposed project would qualify for permits under Alternative C. The same five-year database (2003 through 2008) of permits and pending permits in the SCAQMD's overall permit database that was used to analyze future localized impacts of the proposed project would be applicable to Alternative C. The same Source Classification Codes (SCCs) would be applicable: (1) to assigning stack parameters to emission sources for modeling on the basis of source type; and (2) to estimate chemical speciation of permitted emissions reported as PM and organic gases with respect to particle size composition of PM emissions.

The main difference between Alternative C and the proposed project is that under Alternative C, large businesses would be prohibited from obtaining offsets through the SCAQMD's internal offset accounts. Evaluation of permit data indicates that large businesses are not necessarily large emitters. As a result, since it is likely that the localized criteria pollutant analysis would apply to small businesses to the same or extent as it would apply to large businesses, the analysis is still applicable to Alternative C. However, because large businesses would no longer qualify for the offset exemptions in Rule 1304, fewer facilities would be built that could have localized air quality impacts.

3. *Health Effects – Would Alternative C Expose Sensitive Receptors to Substantial Pollutant Concentrations*

Region-wide Emissions of Criteria Pollutants—Alternative C

The analysis of the Alternative C includes a comparison of the health impacts of Alternative C to the health impacts of the proposed project. Increases in criteria pollutant emissions may result in potential adverse health effects including the following: cardiovascular, neurological, reproductive and respiratory diseases. Health effects have been evaluated by modeling criteria pollutant concentrations, which can provide information on mortality, hospital admissions, emergency room visits, minor restricted activity days, school absence days, loss of work days, and cases of acute/chronic bronchitis, nonfatal heart attacks and adverse upper/lower respiratory conditions. Table 6-64 shows the estimated health effects from the proposed project and

Alternative C as a result of exposures to ozone for the milestone years of the analysis. Similarly, Table 6-65 shows the estimated health effects from Alternative C compared to the proposed project as a result of exposure to PM_{2.5} and PM₁₀ during the milestone years analyzed. The impacts shown in Tables 6-64 and 6-65 represent additional benefits foregone beyond the benefits forecasted in the 2007 AQMP Final Socioeconomic Report (SCAQMD, 2007) that could occur if the proposed project and Alternative C were not implemented or replaced by growth.

TABLE 6-64
Proposed Project and Alternative C – Estimated Ozone Health Impacts –
Health Benefits Foregone

Year	Mortality Deaths (People)	Hospital Admissions (People)	Minor Restricted Activity Days (Days)	School Absences (Days)
Proposed Project				
2014	7	42	29,575	31,172
2023	12	71	49,513	52,186
2030	20	122	85,339	89,947
Alternative C				
2014	7	40	28,074	29,589
2023	10	61	42,958	45,278
2030	18	109	76,309	80,430

TABLE 6-65
Proposed Project and Alternative C – Estimated PM_{2.5}
and PM₁₀ Health Impacts – Health Benefits Foregone

Year	Mortality Deaths (People)	Acute Bronchitis (People)	Chronic Bronchitis (People)	Non-fatal Heart Attacks (People)	Upper/ Lower Respiratory (People)	Emergency Room Visits	Hospital Admissions (People)	Minor Restricted Activity Days	Work Loss (Days)
Proposed Project									
2014	33	59	18	29	1,262	11	13	23,374	4,074
2023	86	155	46	74	3,283	29	34	60,814	10,601
2030	125	224	66	108	4,763	42	50	88,214	15,377
Alternative C									
2014	30	53	16	26	1,128	10	12	20,894	3,642
2023	75	134	40	65	2,853	25	30	52,840	9,211
2030	107	192	57	93	4,083	36	43	75,620	13,182

The SCAQMD has not developed significance thresholds for the specific health effects identified in Tables 6-64 and 6-65. However, given the magnitude of the health effects foregone compared to health effect conditions in the absence of Alternative C, SCAQMD staff concludes that Alternative C has the potential to generate significant adverse health effects. Because Alternative C prohibits large businesses from accessing offsets from the SCAQMD's internal offset accounts, fewer new or modified sources are expected to be built in the future. As a result, health effects generated by Alternative C are expected to be significant, but less significant than health effects generated by the proposed project.

Region-wide Emissions of Criteria Pollutants-- Cumulative Effects

The cumulative health impacts analysis includes health effects of Alternative C, plus health effects of the reasonably foreseeable power plant projects and the effects of the additional three years of past sources permitted in reliance on the SCAQMD's internal offset account (2007 through 2009). Table 6-66 shows the estimated health effects from the cumulative scenarios with the proposed project and with Alternative C as a result of exposures to ozone for the milestone years of the analysis. Table 6-67 shows the estimated health effects from the cumulative scenarios with the proposed project and with Alternative C as a result of exposures to PM_{2.5} and PM₁₀ for the milestone years of the analysis.

TABLE 6-66
Proposed Project and Alternative C –
Estimated Cumulative Ozone Health Impacts

Year	Mortality Deaths (People)	Hospital Admissions (People)	Minor Restricted Activity Days (Days)	School Absences (Days)
Cumulative With Proposed Project				
2014	9	54	37,662	39,696
2023	15	92	64,780	68,278
2030	24	143	100,213	105,624
Cumulative With Alternative C				
2014	9	52	36,532	38,505
2023	12	73	51,561	54,345
2030	20	121	84,733	89,308

TABLE 6-67
Proposed Project and Alternative C -
Estimated Cumulative Annual PM_{2.5} and PM₁₀ Health Impacts

Year	Mortality Deaths (People)	Acute Bronchitis (People)	Chronic Bronchitis (People)	Non-fatal Heart Attacks (People)	Upper/Lower Respiratory (People)	Emergency Room Visits	Hospital Admissions (People)	Minor Restricted Activity Days	Work Loss (Days)
Cumulative With Proposed Project									
2014	102	184	55	89	3,908	34	41	72,384	12,618
2023	152	273	81	132	5,803	51	61	107,476	18,735
2030	189	341	101	164	7,231	63	76	133,938	23,347
Cumulative With Alternative C									
2014	99	178	53	86	3,772	33	39	69,857	12,177
2023	141	253	75	122	5,370	47	56	99,471	17,339
2030	172	309	92	149	6,555	57	69	121,406	21,163

The SCAQMD has not developed specific significance thresholds for cumulative health impacts. Given the magnitude of the health benefits foregone that would occur if Alternative C were implemented, the contribution to cumulative impacts from Alternative C is concluded to be cumulatively considerable.

Region-wide Emissions of TACs

Basin toxic risks (measured in cancer risk per million person population over a lifetime of exposure) were estimated using the MATES-III modeling platform for 2014, 2023 and 2030 model year simulations. For reference, the MATES-III study for 2008 attributed the cancer risk from stationary sources, which include industries, and businesses such as dry cleaners and chrome plating operations at approximately 51 additional cancers in a population of one million individuals whereas the total regional cancer risk from all toxic air contaminants was 853 in one million. Table 6-68 shows the additional region-wide cancer risk and cancer burden reductions foregone beyond those anticipated in the 2007 AQMP, if Alternative C or to the proposed project were implemented as compared to conditions without the Project. Table 6-68 also shows the contribution to cancer risk and cancer burden from the cumulative scenario with Alternative C and the cumulative scenario with the proposed project.

TABLE 6-68
Proposed Project and Alternative C –Cancer Risk and Cancer
Burden Impacts (Project-specific and Cumulative)

Year	Cancer Risk Reduction Not Achieved^a	Cumulative Cancer Risk Reduction Not Achieved^a	Cancer Burden Reductions Not Achieved	Cumulative Cancer Burden Reductions Not Achieved
Proposed Project				
2014	0.91	3.35	16	59
2023	2.86	5.15	54	96
2030	4.4	6.59	86	129
Alternative C				
2014	0.82	3.26	14	57
2023	2.54	4.83	48	90
2030	3.96	6.09	77	119

^a Additional cases of cancer in a population of one million individuals.

As shown in Table 6-68, neither the proposed project nor Alternative C would generate project-specific or cumulative cancer risk impacts that exceed the SCAQMD's cancer risk significance threshold of 10 in one million (10×10^{-6}).

The proposed project and Alternative C would result in project-specific or cumulative cancer burden impacts that exceed the SCAQMD's significance threshold of 0.5. Compared to the without project scenario, the proposed project would create an increased project-specific cancer burden impact in the year 2030 of 87. Alternative C would create an increased project-specific cancer burden impact of 74 in the year 2030. In addition, the cumulative scenarios with both the proposed project and with Alternative C result in significant cancer burdens compared to the without project scenarios. The contributions to cumulative cancer burden impacts are considered to be cumulatively considerable but less than the proposed project.

A hazard index (HI) is a summation of the hazard (non-cancer) quotients for all chemicals to which an individual is exposed. A hazard index can be measured as a result of chronic (long-term) exposure or acute (short-term) exposure. SCAQMD's significance threshold for non-cancer chronic or acute HI value is 1.0 because if the HI is less than 1.0, it is presumed that no significant adverse human health effects (non-cancer) are expected to occur. Table 6-69 shows the population-weighted project-specific change in chronic HI between the conditions without the project the proposed project and between the conditions without the project and Alternative C. Table 6-69

also shows the changes between the conditions without the project and the cumulative scenarios with the proposed project and with Alternative C.

TABLE 6-69
Proposed Project and Alternative C – Chronic and Acute Health
Impacts (Project-specific and Cumulative)

Year	Chronic Health Index Not Achieved	Cumulative Chronic Health Index Not Achieved	Acute Health Index Not Achieved	Cumulative Acute Health Index Not Achieved
Proposed Project				
2014	0	0.02	0.02	0.06
2023	0.02	0.03	0.05	0.09
2030	0.02	0.03	0.08	0.11
Alternative C				
2014	0	0.02	0.02	0.05
2023	0.01	0.03	0.04	0.08
2030	0.02	0.03	0.07	0.10

As shown in Table 6-69, neither the proposed project nor Alternative C would exceed the SCAQMD's acute or chronic HI significance threshold of 1.0. Similarly, Table 6-69 shows that acute and chronic HI impacts from the proposed project with the cumulative scenario and Alternative C with the cumulative scenario would not exceed the HI significance threshold. Therefore, neither the proposed project nor Alternative C would generate project-specific or cumulative non-cancer health risk impacts, while impacts from Alternative C would be equivalent to or less or than the proposed project.

Localized Emissions of TACs

Under Alternative C, sources permitted under Rules 1304 and 1309.1 would be subject to the requirements in Rules 1401 and 1402 that limit the cancer risk and non-cancer hazard level, which would limit any potential significant toxic impact from each source. The thresholds in Rule 1401 are the same as the SCAQMD's CEQA significance thresholds for toxics. As a result of these regulatory prohibitions, the issuance of a permit by the SCAQMD to a stationary source of TACs would not result in stationary source emissions that exceed the CEQA significance thresholds for localized health impacts. However, the thresholds contained in Rule 1401 are applied on a permit-unit basis; as a result, a facility with multiple permitted sources could still exceed the Hazard Index limits in Rule 1401. Such facilities

would instead be subject to Rule 1402; under that rule, the allowable cancer burden is the same as under Rule 1401, but the Hazard Index limits for acute and chronic non-cancer toxic impacts are higher (3.0) than the limits under Rule 1401 and thus higher than the applicable CEQA significance thresholds. Therefore, the localized air toxic impacts of the proposed project are considered significant.

The main difference between Alternative C and the proposed project is that under Alternative C, large businesses would be prohibited from obtaining offsets through the SCAQMD's internal offset accounts. Evaluation of permit data indicates that large businesses are not necessarily large emitters. As a result, since it is likely that the localized TACs analysis would apply to small businesses to the same or greater extent as it would apply to large businesses, the analysis is still applicable to Alternative C. Therefore, Alternative C has the potential to generate adverse localized impacts from emissions of TACs equivalent to the significant impacts of the proposed project.

4. *Odors – Would Alternative C Create Objectionable Odors Affecting a Substantial Number of People*

Some equipment permitted under Rules 1304 and 1309.1 could create objectionable odors, as explained in subchapter 4.1. Evaluation of permits includes the imposition of conditions to minimize such odors. In addition, installing BACT equipment would typically contribute to a reduction in potential odor impacts. Further, SCAQMD Rule 402 prohibits operation of a facility that creates an odor nuisance. Nevertheless, as explained in subchapter 4.1, facilities containing sources receiving permits under the proposed project could result in significant odor impacts. Alternative C could result in the same types of facilities as the proposed project; and therefore would have the same potential to result in significant odor impacts.

Visibility Impacts

5. *Visibility. Would the Alternative C create significant aesthetic impacts by resulting in air emissions that substantially degrade the existing visual character or quality of the project surroundings?*

Alternative C Effects

Table 6-70 shows predicted visibility and visual range impacts from Alternative C and the proposed project with respect to the state standard. The state standard is a light extinction coefficient of 0.23 per kilometer when relative humidity is less than 70 percent (roughly equivalent to a 10-mile visual range), over an 8-hour averaging period (10 am – 6 pm, PST). Visual range (measured in miles) is provided for informational purposes. The range of without project values for the extinction coefficient predicted for the eastern Basin represented by Riverside-Rubidoux (the worst case) is from 0.063 to

0.067 from 2014 to 2030 over the project timeframe, or one-third of the California standard. The maximum predicted impact on the light extinction coefficient ($.001 \text{ km}^{-1}$) attributable to the proposed project would not cause or contribute to a violation of the state standard and would not be significant. As shown in Table 6-70, visual range impacts for Alternative C are less than or equal to the proposed project and, therefore, are also concluded to be less than significant.

TABLE 6-70
Proposed Project and Alternative C – Visibility Impacts at Riverside-Rubidoux
Measured in Extinction Coefficient and Visual Range (miles)

Milestone Year	Predicted Extinction Coefficient Without the Project (km^{-1})	Impact on Extinction Coefficient		Visual Range Without Project (miles)	Difference in Miles	
		Proposed Project	Alternative C		Proposed Project	Alternative C
2014	0.0672	0.0002	0.0002	36.512	-0.091	-0.082
2023	0.0629	0.0005	0.0004	39.290	-0.274	-0.238
2030	0.0656	0.0008	0.0007	37.633	-0.469	-0.402

The deciview – an index which incorporates incremental changes in people’s perception of visibility is directly used as the metric for visibility assessment in the federal Regional Haze visibility standard. A 0.5 deciview change is used to assess significance in Class I wilderness areas. Table 6-71 shows the visibility effects of Alternative C and the visibility effects of the proposed project in terms of deciview changes.

TABLE 6-71
Proposed Project and Alternative C – Visibility Impacts at Class-I Wilderness Areas
Measured in Deciview and Visual Range (miles)

Milestone Year Area Impacted	Predicted Deciview Value Without Project	Total Impact (Difference in Deciviews)		Predicted Visual Range Without Project (miles)	Predicted Visual Range With Project (miles)	
		Proposed Project	Alternative C		Proposed Project	Alternative C
2014						
Agua Tibia	17.709	0.007	0.006	41.463	0.022	-0.027
San Gabriel	16.566	0.014	0.013	49.529	0.058	-0.057
Cucamonga	16.032	0.012	0.011	50.620	0.049	-0.054
San Gorgonio	13.037	0.006	0.005	67.717	0.023	-0.033
San Jacinto	13.964	0.006	0.005	60.644	0.02	-0.036
Joshua Tree	11.251	0.005	0.004	90.694	0.017	-0.03

TABLE 6-71 (Concluded)
Proposed Project and Alternative C – Visibility Impacts at Class-I Wilderness Areas
Measured in Deciview and Visual Range (miles)

Milestone Year Area Impacted	Predicted Deciview Value Without Project	Total Impact (Difference in Deciviews)		Predicted Visual Range Without Project (miles)	Predicted Visual Range With Project (miles)	
		Proposed Project	Alternative C		Proposed Project	Alternative C
2023						
Agua Tibia	17.699	0.02	0.017	41.497	-0.081	-0.07
San Gabriel	16.262	0.042	0.036	50.709	-0.194	-0.169
Cucamonga	15.732	0.03	0.026	51.881	-0.147	-0.128
San Gorgonio	12.986	0.018	0.016	67.866	-0.114	-0.099
San Jacinto	13.940	0.014	0.012	60.735	-0.086	-0.075
Joshua Tree	11.297	0.005	0.01	90.396	-0.075	-0.065
2030						
Agua Tibia	17.781	0.022	0.019	41.161	-0.088	-0.075
San Gabriel	16.321	0.058	0.05	50.405	-0.265	-0.227
Cucamonga	15.865	0.049	0.042	51.224	-0.243	-0.208
San Gorgonio	13.124	0.023	0.02	67.006	-0.138	-0.118
San Jacinto	14.056	0.020	0.017	60.075	-0.119	-0.102
Joshua Tree	11.378	0.017	0.015	89.893	-0.108	-0.093

As shown in Table 6-71, the maximum project impact measured in deciviews would be less than 0.06 for all locations and milestone years, which is not significant. Similarly, implementing Alternative C would also generate a maximum impact measured in deciviews that would be less than 0.05 for all locations and milestone years, which is not significant. Further, visibility impacts from Alternative C would be less than visibility impacts from the proposed project.

Cumulative Effects

The cumulative visibility analysis includes effects of Alternative C, plus effects of the reasonably foreseeable power plant projects, and the additional three years of past sources receiving permits in reliance upon the SCAQMD's offset accounts (2007 through 2009). Table 6-72 presents the visibility effects of the cumulative scenario with Alternative C and the cumulative scenario with the proposed project. The maximum predicted impact on the light extinction coefficient ($.001 \text{ km}^{-1}$) attributable to the cumulative scenario with the proposed project would not cause or contribute to a

violation of the state standard and would not be significant. Neither Alternative C nor the proposed project would make a cumulatively considerable contribution to a significant cumulative visibility impact.

TABLE 6-72
Proposed Project and Alternative C – Cumulative Visibility Impacts at Riverside-Rubidoux Measured in Extinction Coefficient and Visual Range (miles)

Milestone Year	Predicted Extinction Coefficient Without the Project (km^{-1})	Impact on Extinction Coefficient		Visual Range Without Project (miles)	Difference in Miles	
		Cumulative with Proposed Project	Cumulative with Alternative C		Cumulative with Proposed Project	Cumulative with Alternative C
2014	0.0672	0.0003	0.0003	36,512	-0.170	-0.163
2023	0.0629	0.0008	0.0007	39,290	-0.456	-0.419
2030	0.0656	0.0008	0.0007	37,633	-0.469	-0.421

The cumulative visibility impacts analysis for class I wilderness areas includes effects of Alternative C, plus effects of the reasonably foreseeable power plant projects, and the additional three years of sources receiving permits in reliance upon the SCAQMD's offset accounts (2007 through 2009). Table 6-73 presents the visibility effects for class I wilderness areas of the cumulative scenario with Alternative C and the visibility effects of the cumulative scenario with the proposed project in terms of deciview changes. Under the federal standard, a 0.5 deciview change would be considered a significant adverse impact and a cumulatively considerable contribution to a significant cumulative impact. Neither Alternative C nor the proposed project would make a cumulatively considerable contribution to a significant cumulative visibility impact and, therefore, it is concluded that cumulative visibility impacts are not significant. Visibility impacts from Alternative C would be less for all years and locations than for the proposed project.

TABLE 6-73
Proposed Project and Alternative C – Cumulative Visibility Impacts at Class-I
Wilderness Areas Measured in Deciview and Visual Range (miles)

Milestone Year Area Impacted	Predicted Deciview Value Without Project	Total Impact (Difference in Deciviews)		Predicted Visual Range Without Project (miles)	Predicted Visual Range With Project (miles)	
2014		Cumulative with Proposed Project	Cumulative with Alternative C		Cumulative with Proposed Project	Cumulative with Alternative C
Agua Tibia	17.709	0.011	0.011	41.463	-0.044	-0.042
San Gabriel	16.566	0.024	0.023	49.529	-0.108	-0.104
Cucamonga	16.032	0.021	0.02	50.620	-0.101	-0.097
San Gorgonio	13.037	0.012	0.012	67.717	-0.072	-0.069
San Jacinto	13.964	0.009	0.009	60.644	-0.059	-0.057
Joshua Tree	11.251	0.008	0.008	90.694	-0.056	-0.054
2023		Cumulative with Proposed Project	Cumulative with Alternative C		Cumulative with Proposed Project	Cumulative with Alternative C
Agua Tibia	17.699	0.023	0.021	41.497	-0.094	-0.086
San Gabriel	16.262	0.053	0.049	50.709	-0.239	-0.219
Cucamonga	15.732	0.036	0.033	51.881	-0.178	-0.163
San Gorgonio	12.986	0.022	0.02	67.866	-0.139	-0.128
San Jacinto	13.940	0.017	0.016	60.735	-0.105	-0.096
Joshua Tree	11.297	0.014	0.013	90.396	-0.092	-0.084
2030		Cumulative with Proposed Project	Cumulative with Alternative C		Cumulative with Proposed Project	Cumulative with Alternative C
Agua Tibia	17.781	0.025	0.022	41.161	-0.101	-0.09
San Gabriel	16.321	0.066	0.059	50.405	-0.304	-0.272
Cucamonga	15.865	0.057	0.051	51.224	-0.282	-0.253
San Gorgonio	13.124	0.027	0.024	67.006	-0.161	-0.144
San Jacinto	14.056	0.022	0.02	60.075	-0.134	-0.12
Joshua Tree	11.378	0.02	0.018	89.893	-0.125	-0.112

Climate Change

6. Greenhouse Gas Emissions – Would Alternative C result in greenhouse gas emissions that may have a significant impact on the environment, based on any applicable threshold of significance?

The methodology for deriving GHG emission impacts for the project alternatives is the same methodology used for the proposed project, which makes two assumptions. First, SOx emissions were selected as a surrogate to prorate the GHG emissions because SOx emissions result primarily from sulfur contained in fossil fuels. Using a ratio of GHG emissions to SOx emissions from the AQMP inventory, the GHG emissions from the proposed project and project alternatives are calculated using the estimated SOx emissions from the proposed project and multiplying by the ratio factor (see subchapter 4.0 and Appendix D).

Second, an analysis of the statewide inventory was conducted to determine the impact from the remaining GHG pollutants, including HFCs, PFCs and SF6. Combustion GHG emissions are proportional to SOx emissions, while emissions of HFCs, PFCs and SF6 are analyzed as proportional to emissions of CO2, CH4 and N2O, based on the statewide inventory. (See Subchapter 4.0 for additional discussion of the methodology for calculating GHG emissions.). Table 6-74 lists the total GHG emissions from all six GHG pollutants attributed to Alternative C, as well as the GHG emissions attributed to the proposed project.

SCAQMD's adopted Tier 3 GHG significance threshold for SCAQMD lead agency projects is 10,000 MT CO2eq per year. Projects with incremental increases below this threshold are not considered to be cumulatively considerable. As shown in Table 6-74, potential GHG emissions from Alternative C exceed 10,000 MT CO2eq per year and are concluded to be significant, but less than the GHG emissions from the proposed project. Therefore, GHG emissions from Alternative C are considered to be cumulatively considerable (CEQA Guidelines §15065(a)(3)), and, would contribute to significant adverse climate change impacts.

**Table 6-74
Proposed Project and Alternative C – SOx Emissions
and Greenhouse Gas Emissions**

Attainment Year Periods	SOx Emissions (tons/day)	SOx Emissions (tons/year)	CO2, CH4 and N2O Emissions (million MT CO₂ eq /year)	HFCs, PFCs and SF6 Emissions^a (million MT CO₂ eq /year)	TOTAL GHG Emissions^b (million MT CO₂ eq /year)
Proposed Project					
2014	0.16	58.4	4.52	0.29	4.81
2023	0.49	178.85	13.83	0.90	14.74
2030	0.74	270.1	20.89	1.36	22.26

Table 6-74 (Concluded)
Proposed Project and Alternative C – SO_x Emissions
and Greenhouse Gas Emissions

Attainment Year Periods	SO _x Emissions (tons/day)	SO _x Emissions (tons/year)	CO ₂ , CH ₄ and N ₂ O Emissions (million MT CO ₂ eq /year)	HFCs, PFCs and SF ₆ Emissions ^a (million MT CO ₂ eq /year)	TOTAL GHG Emissions ^b (million MT CO ₂ eq /year)
Alternative C					
2014	0.13	47.45	3.67	0.24	3.91
2023	0.4	146	11.29	0.73	12.03
2030	0.59	215.35	16.65	1.08	17.74

^a Calculated based on ratio of 0.065 of high GWP/total GHGs. Thus, CO₂, CH₄ and N₂O Emissions x 0.065 = HFCs, PFCs and SF₆ emissions (for example, 4.52 million MT CO₂ eq /year x 0.065 = 0.29 million MT CO₂ eq /year)

^b Total GHG emissions = CO₂, CH₄ and N₂O Emissions + HFCs, PFCs and SF₆ emissions (for example, 4.52 + 0.29 = 4.81 million MT CO₂ eq /year). Total GHG emissions may not be exact due to rounding.

Cumulative Effects

The cumulative analysis includes GHG emissions from Alternative C, plus GHG emissions from the reasonably foreseeable power plant projects, and the additional three years of sources receiving permits in reliance upon the district's offset accounts (2007 through 2009). Table 6-75 presents the GHG emissions from the cumulative scenario with Alternative C and the GHG emissions from the cumulative scenario with the proposed project.

As explained above, GHG emissions from Alternative C are considered to be cumulatively considerable and, therefore, would contribute to significant adverse climate change impacts.

TABLE 6-75
Proposed Project and Alternative C – Cumulative Greenhouse Gas Emissions

Attainment Year Periods	TOTAL GHG Emissions (million MT CO ₂ eq /year)
Cumulative With Proposed Project	
2014	11.98
2023	21.61
2030	29.13
Cumulative With Alternative C	
2014	11.10
2023	18.75
2030	24.62

Alternative D - Use of Credits Generated in 2009 and Beyond Only

1. AQMP Consistency – Would Alternative D Conflict with or Obstruct the Implementation of an Applicable Air Quality Plan?

Like the proposed project, Alternative D would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. Although the AQMP provides strategies for attaining and maintaining the NAAQSs and CAAQSs, it is considered to be a growth accommodating document. The main difference between Alternative D and the proposed project is that Alternative D restricts the availability of offsets through the following mechanisms. First, Alternative D would not allow access to the SCAQMD's existing offset accounts as these accounts would be eliminated under this alternative. Second, only new credits generated each year starting in 2009 could be used to offset emission increases from affected facilities.

Emissions from Alternative D are not expected to conflict with or obstruct the implementation of the AQMP because offsets cannot be issued above the emissions caps, which are based on growth projections of the 2007 AQMP for the relevant industry categories. Because regional criteria pollutant emissions from Alternative D are expected to be less than the regional criteria pollutant emissions from the project, the potential for conflicts with the 2007 AQMP would be even less likely.

2. Criteria Pollutant Emission Standards – Would Alternative D Violate any Air Quality Standard or Contribute to an Existing or Projected Air Quality Violation

a. Regional Mass Criteria Pollutant Emissions – Alternative D Effects

The primary effect of implementing Alternative D is that a fewer number of credits would be available each year after adoption of this alternative compared to the proposed project. The reason fewer offsets would be available is as follows. Alternative D would eliminate all pre-existing offsets in the SCAQMD's internal offset accounts. The SCAQMD would start accruing offsets each year starting in 2009 and issuing only those offsets available that have accrued starting in 2009. Table 6-76 shows the emissions from Alternative D in comparison to the emissions from the proposed project. As can be seen from Table 6-76, the emissions of VOCs, NO_x, CO and PM_{2.5} from Alternative D would be significant, but would be less than the emissions from the proposed project. Unlike the proposed project, Alternative D would result in less than significant emissions of SO_x and PM₁₀.

TABLE 6-76
Proposed Project and Alternative D Stationary Source Emissions

Milestone Years	Pollutant					
	VOC	NO _x	SO _x	CO	PM ₁₀	PM _{2.5}
	Proposed Project - Tons per Day					
2014	16.99	1.29	0.16	1.14	0.85	0.54
2023	34.52	2.38	0.49	4.16	2.84	1.8
2030	44.59	3.31	0.74	6.26	4.44	2.82
Proposed Project - Pounds per Day						
2014	33,980	2,580	320	2,280	1,700	1,080
2023	69,040	4,760	980	8,320	5,680	3,600
2030	89,180	6,620	1,480	12,520	8,880	5,640
Alternative D - Tons per Day						
2014	11.21	0.77	0.03	0.87	0.03	0.02
2023	15.56	1.05	0.04	1.37	0.04	0.03
2030	15.56	1.05	0.04	1.37	0.04	0.03
Milestone Years	Pollutant					
	VOC	NO _x	SO _x	CO	PM ₁₀	PM _{2.5}
	Alternative D Pounds per day					
2014	22,420	1,540	60	1,740	60	40
2023	31,120	2,100	80	2,740	80	60
2030	31,120	2,100	80	2,740	80	60
Regional Significance Thresholds (Pounds per Day)						
Significance Threshold	55	55	150	550	150	55
Significant?	Yes	Yes	No	Yes	No	Yes

As indicated in Subchapter 4.1, SCAQMD staff determined that total lead emissions in the district are approximately 18 lbs/day (6,517 lbs/yr) based on fiscal year (FY) 2006-2007 data comprised of 566 facilities in the Basin that reported lead emissions. Lead emission impacts were calculated for the same milestone years evaluated for other emission impacts. As shown in Table 6-77, the maximum net increase in lead emissions by 2030 in the Basin from the proposed project and the cumulative scenario with the proposed project would not exceed the SCAQMD's mass daily significance threshold for lead of three pounds per day. Similarly, Table 6-77 shows that lead emission impacts

from Alternative D and from the cumulative scenario with Alternative D would be less-than-significant.

Cumulative Effects

As explained in Chapters 4.0 and 4.1, the cumulative impact analysis includes emissions from sources permitted under Rules 1304 and 1309.1 pursuant to prior version of Rule 1315 and SB 827. In addition, the cumulative impacts analysis includes emissions from three power plants.

TABLE 6-77
Proposed Project and Alternative D –
Project-Specific and Cumulative Lead Emissions

Milestone Years	Lead (lbs/day)			
	Proposed Project	Cumulative With Proposed Project	Alternative D	Cumulative With Alternative D
2014	0.13	0.33	0.00	0.25
2023	0.45	0.50	0.01	0.22
2030	0.70	0.63 ³	0.01	0.21

Table 6-78 presents the total mass emissions from stationary sources under Alternative D plus the other sources included in the cumulative scenario. As shown in Table 6-78, cumulative impacts from Alternative D are considered to be cumulatively considerable.

TABLE 6-78
Proposed Project and Alternative D Cumulative Stationary Source Mass Emissions

Milestone Years	Pollutant					
	VOC	NOx	SOx	CO	PM10	PM2.5
	Cumulative With Proposed Project – Tons per Day					
2014	23.71	4.7	0.47	10.82	3.47	2.87
2023	40.76	5.64	0.79	14.36	5.29	4.02
2030	50.74	6.61	1.04	16.55	6.79	4.97

³ For lead emitting facilities, in the early years of the analysis there were some SIC facility categories with negative growth factors, resulting in lower overall lead emissions. Based on this factor, the cumulative net increase in lead emissions was determined to be lower than the proposed project because it included more years of negative growth.

TABLE 6-78 (Concluded)
Proposed Project and Alternative D Cumulative Stationary Source Mass Emissions

Milestone Years	Pollutant					
	VOC	NO _x	SO _x	CO	PM ₁₀	PM _{2.5}
	Cumulative With Proposed Project – Tons per Day					
2014	47,420	9,400	940	21,640	6,940	5,740
2023	81,520	11,280	1,580	28,720	10,580	8,040
2030	101,480	13,220	2,080	33,100	13,580	9,940
Cumulative With Alternative D Tons per Day						
2014	17.93	4.18	0.34	10.55	2.65	2.35
2023	21.8	4.32	0.34	11.57	2.49	2.24
2030	21.71	4.35	0.34	11.66	2.38	2.18
Milestone Years	Pollutant					
	VOC	NO _x	SO _x	CO	PM ₁₀	PM _{2.5}
	Cumulative With Alternative D Pounds per Day					
2014	35,860	8,360	680	21,100	5,300	4,700
2023	43,600	8,640	680	23,140	4,980	4,480
2030	43,420	8,700	680	23,320	4,760	4,360
Regional Significance Thresholds (Pounds per Day)						
Significance Threshold	55	55	150	550	150	55
Significant?	Yes	Yes	Yes	Yes	Yes	Yes

Modeled Concentrations of Criteria Pollutants

Regional Criteria Pollutant Concentrations

a. Ozone Concentrations

In addition to analyzing project-specific effects of Alternative D in terms of mass emissions of criteria pollutants, this PEA includes a supplemental analysis of the contribution of Alternative D to regional concentrations of these same criteria pollutants.

Air quality is expected to improve under future conditions, with or without the proposed project or alternatives. Table 6-79 shows the contributions from Alternative D and the proposed project to the Basin and Coachella Valley ozone concentrations for the

milestone years of 2014, 2023, and 2030. As shown in Table 6-79, for most milestone years, Alternative D would contribute less to ozone concentrations than the proposed project.

TABLE 6-79
Project and Alternative D – Contribution to Regional Ozone Concentration
Concentrations (Peak 8-hour concentrations)

Year	Basin Average Ozone (ppb)	Basin Maximum Station Ozone (ppb)	Coachella Valley Average Ozone (ppb)	Coachella Valley Maximum Station Ozone (ppb)
Proposed Project				
2014	0.9	1.4	0.5	0.6
2023	1.5	1.9	0.8	1.1
2030	2.6	2.9	1.1	1.3
Alternative D				
2014	0.7	1.0	0.4	0.4
2023	0.7	0.8	0.5	0.5
2030	1.5	1.2	0.6	0.5

b. Particulate Matter Concentrations

Table 6-80 shows the contribution of emissions from Alternative D compared to the proposed project for the predicted annual average and 24-hour (daily) average Basin and Coachella Valley PM_{2.5} and PM₁₀ concentrations estimated for the milestone years of 2014, 2023 and 2030. As shown in the table, for most milestone years, Alternative D contributes less to regional concentrations of particulate matter than the proposed project. Another way of looking at the results in Table 6-80 is that for most years Basin and Coachella Valley predicted annual average and 24-hour average PM_{2.5} and PM₁₀ concentration improvements foregone from Alternative D are equal to or less than the proposed project.

Table 6-80
Proposed Project and Alternative D – Contributions to Regional PM2.5
and PM10 Concentrations

Year	Basin Annual PM2.5 ($\mu\text{g}/\text{m}^3$)	Basin Annual PM10 ($\mu\text{g}/\text{m}^3$)	Basin Daily PM2.5 ($\mu\text{g}/\text{m}^3$)	Basin Daily PM10 ($\mu\text{g}/\text{m}^3$)	Coachella Valley Annual PM2.5 ($\mu\text{g}/\text{m}^3$)	Coachella Valley Annual PM10 ($\mu\text{g}/\text{m}^3$)	Coachella Valley Daily PM2.5 ($\mu\text{g}/\text{m}^3$)	Coachella Valley Daily PM10 ($\mu\text{g}/\text{m}^3$)
Proposed Project								
2014	0.06	0.12	0.6	0.7	0.01	0.01	0.1	0.1
2023	0.15	0.32	1.2	1.8	0.03	0.03	0.1	0.1
2030	0.21	0.47	1.6	2.5	0.05	0.05	0.2	0.2
Alternative D								
2014	0.02	0.05	0.3	0.4	0	0	0	0
2023	0.03	0.06	0.5	0.5	0.01	0.01	0.1	0.1
2030	0.03	0.06	0.5	0.5	0.01	0.01	0.1	0.1

c. NO₂ Concentrations

Table 6-81 shows the contributions to regional NO₂ concentrations from Alternative D compared to the proposed project. The regional NO₂ concentration analysis is based on an emissions-weighted approach to estimate the incremental contributions of NO₂ from Alternative D. As Table 6-81 shows, Alternative D and the proposed project would result in NO₂ concentrations of 1.0 ppb or less for all milestone years, regardless of the averaging time.

TABLE 6-81
Alternative D and the Proposed Project – Contributions to
Regional NO₂ Concentrations

Milestone Year	Basin 1-Hour Average NO ₂ (ppb)	Basin Annual Average NO ₂ (ppb)	Coachella 1-Hour Average NO ₂ (ppb)	Coachella 24-Hour Average NO ₂ ^b (ppb)
Proposed Project				
2014	0	0	0	0
2023	1	0	0	0
2030	1	0	0	0

TABLE 6-81 (Concluded)
Alternative D and the Proposed Project – Contributions to
Regional NO₂ Concentrations

Milestone Year	Basin 1-Hour Average NO₂ (ppb)	Basin Annual Average NO₂ (ppb)	Coachella 1-Hour Average NO₂ (ppb)	Coachella 24-Hour Average NO₂^b (ppb)
Alternative D				
2014	0	0	0	0
2023	0	0	0	0
2030	0	0	0	0

d. SO₂ Concentrations

Table 6-82 shows the contributions to regional SO₂ concentrations from Alternative D compared to the proposed project. The regional SO₂ concentration analysis is also based on an emissions-weighted approach to estimate the incremental increased contributions of SO₂ from Alternative D. Both Alternative D and the proposed project would result in contributions to SO₂ concentrations in the Basin of 0.04 ton per day or less, which is less than 0.1 percent of the Basin SO_x emissions, and less than 1.0 ppb for all milestone years, regardless of the averaging time. SO₂ is not measured in the Coachella Valley because there are so few SO₂ emissions sources.

TABLE 6-82
Alternative D and the Proposed Project –
Contributions to Regional SO₂ Concentrations^a

Milestone Year	Basin 1-Hour Average SO₂ (ppb)	Basin 24-Hour Average SO₂ (ppb)	Basin Annual Average SO₂^b (ppb)
Proposed Project			
2014	1	0	0
2023	1	0	0
2030	1	0	0
Alternative D			
2014	0	0	0
2023	0	0	0
2030	0	0	0

^a SO₂ is not measured in the Coachella Valley.

^b Annual average daily SO_x emissions from all point and areas sources are less than 0.04 tons per day, but are rounded up to the nearest whole number.

e. CO Concentrations

Ambient concentrations of carbon monoxide respond linearly to changes in the emissions inventory. Table 6-83 shows the contributions to ambient CO concentrations in the Basin from Alternative D compared to the proposed project. Table 6-83 shows that CO concentrations from Alternative D are less than or equal to the project-specific concentrations from the proposed project.

TABLE 6-83
Alternative D and the Proposed Project –
Contributions to Regional CO Concentrations

Milestone Year	Change in Concentration (ppm)	
	Proposed Project	Alternative D
2014	0.00	0.00
2023	0.01	0.00
2030	0.01	0.00

Modeled Concentrations of Criteria Pollutants

Regional Criteria Pollutant Concentrations – Alternative D

a. Cumulative Ozone Concentrations

In addition to analyzing project-specific contributions of Alternative D to regional pollutant concentrations, this PEA includes an analysis of the combined contributions to regional pollutant concentrations from Alternative D plus other sources receiving permits in reliance upon the SCAQMD's internal offset accounts. Table 6-84 shows the contribution to regional ozone concentrations from such sources in terms of the 8-hour ozone concentrations as between the cumulative scenario with Alternative D compared to the cumulative scenario with the proposed project. As shown in the table, the cumulative scenario with Alternative D results in the same or less contributions to regional ozone concentrations than the proposed project.

TABLE 6-84
Proposed Project and Alternative D Cumulative Scenarios – Contributions to
Regional Ozone Concentrations (Peak 8-hour Concentrations)

Year	Basin Average Ozone (ppb)	Basin Maximum Station Ozone (ppb)	Coachella Valley Average Ozone (ppb)	Coachella Valley Maximum Station Ozone (ppb)
Cumulative With Proposed Project				
2014	1.1	1.8	0.8	0.8
2023	2.0	2.5	1.0	1.3
2030	3.0	3.5	1.3	1.6
Cumulative With Alternative D				
2014	0.9	1.4	0.6	0.6
2023	1.0	0.9	0.4	0.4
2030	1.7	1.3	0.4	0.4

b. Cumulative Particulate Matter Concentrations

Table 6-84.1 presents the contribution of regional particulate matter concentrations from Alternative D with the cumulative scenario compared to the proposed project with the cumulative scenario in terms of the contributions to the predicted annual average and 24-hour (daily) average Basin and Coachella Valley PM2.5 and PM10 concentrations. As shown in the table, for most milestone years, the cumulative scenario with Alternative D would contribute less to regional particulate matter concentrations than the cumulative scenario with the proposed project.

Table 6-84.1
Proposed Project and Alternative D Cumulative Scenarios –Contributions to Regional
PM2.5 and PM10 Concentrations

Year	Basin Annual PM2.5 (µg/m ³)	Basin Annual PM10 (µg/m ³)	Basin Daily PM2.5 (µg/m ³)	Basin Daily PM10 (µg/m ³)	Coachella Valley Annual PM2.5 (µg/m ³)	Coachella Valley Annual PM10 (µg/m ³)	Coachella Valley Daily PM2.5 (µg/m ³)	Coachella Valley Daily PM10 (µg/m ³)
Cumulative With Proposed Project								
2014	0.18	0.38	1.1	1.8	0.04	0.04	0.1	0.1
2023	0.26	0.57	1.8	2.8	0.06	0.06	0.2	0.2
2030	0.32	0.71	2.2	3.5	0.07	0.07	0.2	0.2
Cumulative With Alternative D								
2014	0.14	0.31	0.9	1.4	0.03	0.03	0.1	0.1
2023	0.14	0.31	1.0	1.5	0.03	0.03	0.1	0.1
2030	0.14	0.31	1.0	1.5	0.03	0.03	0.1	0.1

c. Cumulative NO₂ Concentrations

Table 6-85 shows the contributions to cumulative regional NO₂ concentrations from the cumulative scenario with Alternative D compared to the cumulative scenario with the proposed project. As Table 6-85 shows, the cumulative scenario with Alternative D would contribute the same amount or less to regional NO₂ concentrations than the cumulative scenario with the proposed project.

TABLE 6-85
Alternative D and the Proposed Project Cumulative Scenarios –
Contributions to Regional NO₂ Concentrations

Milestone Year	Basin 1-Hour Average NO₂ (ppb)	Basin Annual Average NO₂ (ppb)	Coachella 1-Hour Average NO₂ (ppb)	Coachella 24-Hour Average NO₂ (ppb)
Cumulative With Proposed Project				
2014	1	0	1	0
2023	2	0	1	0
2030	2	0	1	0
Cumulative With Alternative D				
2014	1	0	0	0
2023	1	0	1	0
2030	1	0	1	0

d. Cumulative SO₂ Concentrations

Table 6-86 also shows the contributions to cumulative regional SO₂ concentrations from the cumulative scenario with Alternative D compared to the cumulative scenario with the proposed project. As shown in the table, for most milestone years, the cumulative scenario with Alternative D would contribute roughly the same amount to regional SO₂ concentrations as the cumulative scenario with the proposed project.

TABLE 6-86
Alternative D and the Proposed Project Cumulative Scenarios –
Contributions to Regional SO₂ Concentrations^a

Milestone Year	Basin 1-Hour Average SO₂ (ppb)	Basin 24-Hour Average SO₂ (ppb)	Basin Annual Average SO₂^b (ppb)
Cumulative With Proposed Project			
2014	1	0	0
2023	1	0	0
2030	1	0	0
Cumulative With Alternative D			
2014	1	0	0
2023	1	0	0
2030	1	0	0

^a SO₂ is not measured in the Coachella Valley.

^b Annual average daily SO_x emissions from all point and areas sources are less than 0.04 tons per day, but are rounded up to the nearest whole number.

e. Cumulative CO Concentrations

Table 6-87 shows the contributions to CO concentrations in the Basin from the cumulative scenario with Alternative D compared to the cumulative scenario with the proposed project. Table 6-87 shows that CO concentrations from the cumulative scenario with Alternative D are not noticeably less than concentrations from the cumulative scenario with the proposed project.

TABLE 6-87
Alternative D and the Proposed Project – Cumulative Scenarios
Contributions to Regional CO Concentrations

Milestone Year	Change in Concentration (ppm)	
	Cumulative With Proposed Project	Cumulative With Alternative D
2014	0.01	0.01
2023	0.02	0.02
2030	0.02	0.02

Localized Criteria Pollutant Concentrations

Tables 4.1-21 and 4.1-22 in Chapter 4 show that the proposed project has the potential to increase localized PM_{2.5} concentrations at sensitive receptors that may be located near future representative facilities. Similarly, Tables 4.1-23 through 4.1-25 show that the proposed project has the potential to increase local NO₂ concentrations at sensitive receptors that may be located near future representative facilities. The analysis of project-specific localized criteria pollutant impacts prepared for the proposed project applies to Alternative D for the following reasons. Because most components of Alternative D are identical to the proposed project, the same future representative facilities that would qualify for permits pursuant to Rules 1304 or 1309.1 under the proposed project would qualify for permits under Alternative D. The same five-year database (2003 through 2008) of permits and pending permits in the SCAQMD's overall permit database that was used to analyze future localized impacts of the proposed project would be applicable to Alternative D. The same Source Classification Codes (SCCs) would be applicable: (1) to assigning stack parameters to emission sources for modeling on the basis of source type; and (2) to estimate chemical speciation of permitted emissions reported as PM and organic gases with respect to particle size composition of PM emissions.

The main difference between Alternative D and the proposed project is that under Alternative D, the SCAQMD's pre-existing offset accounts would be eliminated and only credits generated in the year 2009 and after could be used to offset future emission increases from affected facilities receiving permits under Rules 1304 and 1309.1. Although fewer sources would be permitted under Alternative D compared to the proposed project, future affected facilities receiving permits under Alternative D could have the same characteristics as the facilities used to analyze project-specific localized criteria pollutant impacts under the proposed project.

3. Health Effects – Would Alternative D Expose Sensitive Receptors to Substantial Pollutant Concentrations

Region-wide Emissions of Criteria Pollutants—Alternative D

The analysis of Alternative D includes a comparison of the health impacts of Alternative D to the health impacts of the proposed project. Increases in criteria pollutant emissions may result in potential adverse health effects including the following: cardiovascular, neurological, reproductive and respiratory diseases. Health effects have been evaluated by modeling criteria pollutant concentrations, which can provide information on mortality, hospital admissions, emergency room visits, minor restricted activity days, school absence days, loss of work days, and cases of acute/chronic bronchitis, nonfatal heart attacks and adverse upper/lower respiratory conditions. Table 6-88 shows the estimated health effects from the proposed project and Alternative D as a result of exposures to ozone for the milestone years of the analysis. Similarly, Table 6-89 shows

the estimated health effects from Alternative D compared to the proposed project as a result of exposure to PM_{2.5} and PM₁₀ during the milestone years analyzed. The impacts shown in Tables 6-88 and 6-89 represent additional health benefits, beyond the benefits forecasted in the 2007 AQMP Final Socioeconomic Report that could occur if the proposed project and Alternative D were not implemented or replaced by other growth.

TABLE 6-88
Proposed Project and Alternative D – Estimated Ozone Health Impacts – Health Benefits Foregone

Year	Mortality Deaths (People)	Hospital Admissions (People)	Minor Restricted Activity Days (Days)	School Absences (Days)
Proposed Project				
2014	7	42	29,575	31,172
2023	12	71	49,513	52,186
2030	20	122	85,339	89,947
Alternative D				
2014	5	32	22,219	23,419
2023	6	35	24,658	25,989
2030	12	71	49,579	52,255

TABLE 6-89
Proposed Project and Alternative D – Estimated PM_{2.5} and PM₁₀ Health Impacts – Health Benefits Foregone

Year	Mortality Deaths (People)	Acute Bronchitis (People)	Chronic Bronchitis (People)	Non-fatal Heart Attacks (People)	Upper/Lower Respiratory (People)	Emergency Room Visits	Hospital Admissions (People)	Minor Restricted Activity Days	Work Loss (Days)
Proposed Project									
2014	33	59	18	29	1,262	11	13	23,374	4,074
2023	86	155	46	74	3,283	29	34	60,814	10,601
2030	125	224	66	108	4,763	42	50	88,214	15,377
Alternative D									
2014	13	23	7	11	478	4	5	8,852	1,543
2023	17	31	9	15	659	6	7	12,209	2,128
2030	17	31	9	15	659	6	7	12,209	2,128

The SCAQMD has not developed significance thresholds for the specific health effects identified in Tables 6-88 and 6-89. However, given the magnitude of the health effects foregone compared to health effect conditions in the absence of Alternative D, SCAQMD staff concludes that Alternative D has the potential to generate significant adverse health effects. Because Alternative D would eliminate the SCAQMD's existing offset accounts and only allow the use of credits generated in 2009 and after to offset emission increases from affected facilities, substantially fewer new or modified sources are expected to be built in the future. As a result, health effects generated by Alternative D are expected to be significant, but less significant than health effects generated by the proposed project.

Region-wide Emissions of Criteria Pollutants-- Cumulative Effects

The cumulative health impacts analysis includes health effects of Alternative D, plus health effects of the reasonably foreseeable power plant projects, and the effects of the additional three years of past sources permitted in reliance on the SCAQMD's internal offset account (2007 through 2009). Table 6-90 shows the estimated health effects from the cumulative scenarios with the proposed project and with Alternative D as a result of exposures to ozone for the milestone years of the analysis. Table 6-91 shows the estimated health effects as a result of cumulative scenario with the proposed project compared to the cumulative scenario with Alternative D as a result of exposures to PM2.5 and PM10 for the milestone years of the analysis.

TABLE 6-90
Proposed Project and Alternative D -
Estimated Cumulative Ozone Health Impacts

Year	Mortality Deaths (People)	Hospital Admissions (People)	Minor Restricted Activity Days (Days)	School Absences (Days)
Cumulative With Proposed Project				
2014	9	54	37,662	39,696
2023	15	92	64,780	68,278
2030	24	143	100,213	105,624
Cumulative With Alternative D				
2014	7	40	28,358	29,889
2023	8	48	33,473	35,280
2030	13	80	56,034	59,060

TABLE 6-91
Proposed Project and Alternative D -
Estimated Cumulative Annual PM_{2.5} and PM₁₀ Health Impacts

Year	Mortality Deaths (People)	Acute Bronchitis (People)	Chronic Bronchitis (People)	Non-fatal Heart Attacks (People)	Upper/Lower Respiratory (People)	Emergency Room Visits	Hospital Admissions (People)	Minor Restricted Activity Days	Work Loss (Days)
Cumulative With Proposed Project									
2014	102	184	55	89	3,908	34	41	72,384	12,618
2023	152	273	81	132	5,803	51	61	107,476	18,735
2030	189	341	101	164	7,231	63	76	133,938	23,347
Cumulative With Alternative D									
2014	82	147	44	71	3,125	27	33	57,872	10,088
2023	83	150	44	72	3,178	28	33	58,857	10,260
2030	82	148	44	71	3,131	27	33	57,990	10,108

The SCAQMD has not developed specific significance thresholds for cumulative health impacts. Given the magnitude of health benefits foregone that would occur if Alternative D were implemented, SCAQMD staff concludes that Alternative D would make a cumulatively considerable contribution to this significant impact.

Region-wide Emissions of TACs

Basin toxic risks (measured in cancer risk per million person population over a lifetime of exposure) were estimated using the MATES-III modeling platform for 2014, 2023 and 2030 model year simulations D. For reference, the MATES-III study for 2008 attributed the cancer risk from stationary sources, which include industries, and businesses such as dry cleaners and chrome plating operations at approximately 51 additional cancers in a population of one million individuals while the total regional cancer risk from toxic air contaminants was 853 in one million. Table 6-92 shows the additional region-wide cancer risk and cancer burden reductions foregone beyond those anticipated in the 2007 AQMP, if Alternative D or the proposed project were implemented as compared to conditions without the project. Table 6-92 also shows the contribution to cancer risk and cancer burden from the cumulative scenario with Alternative D and the cumulative scenario with the proposed project.

TABLE 6-92
Proposed Project and Alternative D –Cancer Risk and Cancer
Burden Impacts (Project-specific and Cumulative)

Year	Cancer Risk Reduction Not Achieved^a	Cumulative Cancer Risk Reduction Not Achieved^a	Cancer Burden Reductions Not Achieved	Cumulative Cancer Burden Reductions Not Achieved
Proposed Project				
2014	0.91	3.35	16	59
2023	2.86	5.15	54	96
2030	4.4	6.59	86	129
Alternative D				
2014	0.12	2.56	2	45
2023	0.16	2.44	3	46
2030	0.16	2.34	3	46

^a Additional cases of cancer in a population of one million individuals.

As shown in Table 6-92, neither the proposed project nor Alternative D would generate project-specific or cumulative cancer risk impacts that exceed the SCAQMD's cancer risk significance threshold of 10 in one million (10×10^{-6}).

The proposed project and Alternative D would result in cancer burden impacts that exceed the SCAQMD's significance threshold of 0.5. Compared to the without project scenario, the proposed project would create an increased cancer burden impact in the year 2030 of 87. Alternative D would create an increased cancer burden impact of 20 in the year 2030. Similarly, the cumulative scenarios with both the proposed project and with Alternative D result in significant cancer burdens compared to the without project scenarios. The contributions to cumulative cancer burden impacts from Alternative D are considered to be cumulatively considerable, but less than the proposed project.

A hazard index (HI) is a summation of the hazard (non-cancer) quotients for all chemicals to which an individual is exposed. A hazard index can be measured as a result of chronic (long-term) exposure or acute (short-term) exposure. SCAQMD's significance threshold for non-cancer chronic or acute HI value is 1.0 because if the HI is less than 1.0, it is presumed that no significant adverse human health effects (non-cancer) are expected to occur. Table 6-93 shows the population-weighted project-specific change in chronic HI between the conditions without the project and the proposed project and the conditions without the project and Alternative D. Table 6-93

also shows the changes between the conditions without the project and the cumulative scenarios with the proposed project and with Alternative D.

TABLE 6-93
Proposed Project and Alternative D – Chronic and Acute Health
Impacts (Project-specific and Cumulative)

Year	Chronic Health Index Not Achieved	Cumulative Chronic Health Index Not Achieved	Acute Health Index Not Achieved	Cumulative Acute Health Index Not Achieved
Proposed Project				
2014	0	0.02	0.02	0.06
2023	0.02	0.03	0.05	0.09
2030	0.02	0.03	0.08	0.11
Alternative D				
2014	0.0	0.01	0.00	0.04
2023	0.00	0.01	0.00	0.04
2030	0.00	0.01	0.00	0.04

As shown in Table 6-93, neither the proposed project nor Alternative D would exceed the SCAQMD's acute or chronic HI significance threshold of 1.0. Similarly Table 6-93 shows that acute and chronic health risks from the proposed project with the cumulative scenario and Alternative D with the cumulative scenario would not exceed the HI significance threshold. Therefore neither the proposed project nor Alternative D would generate project-specific or cumulatively considerable non-cancer health risk impacts, while impacts from Alternative D would be equivalent to or less than the proposed project.

Localized Emissions of TACs

Under Alternative D, sources permitted under Rules 1304 and 1309.1 would be subject to the requirements in Rules 1401 and 1402 that limit the cancer risk and non-cancer hazard level, which would limit any potential significant toxic impact from each source. The thresholds in Rule 1401 are the same as the SCAQMD's CEQA significance thresholds for toxics. As a result of these regulatory prohibitions, the issuance of a permit by the SCAQMD to a stationary source of TACs would not result in stationary source emissions that exceed the CEQA significance thresholds for localized health impacts. However, the thresholds contained in Rule 1401 are

applied on a permit-unit basis; as a result, a facility with multiple permitted sources could still exceed the Hazard Index limits in Rule 1401. Such facilities would instead be subject to Rule 1402; under that rule, the allowable cancer burden is the same as under Rule 1401, but the Hazard Index limits for acute and chronic non-cancer toxic impacts are higher (3.0) than the limits under Rule 1401 and thus higher than the applicable CEQA significance thresholds. Therefore, the localized air toxic impacts of the proposed project are considered significant.

The main difference between Alternative D and the proposed project is that under Alternative D, the SCAQMD's pre-existing offset accounts would be eliminated and only credits generated in the year 2009 and after could be used to offset future emission increases from affected facilities receiving permits under Rules 1304 and 1309.1. Although fewer new sources would be permitted under Alternative D compared to the proposed project, facilities receiving permits under Alternative D could have the same characteristics as the facilities receiving permits under the proposed project. Therefore, Alternative D has the potential to generate adverse localized impacts from emissions of TACs equivalent to significant impacts of the proposed project.

4. Odors – Would Alternative D Create Objectionable Odors Affecting a Substantial Number of People

Some equipment permitted under Rules 1304 and 1309.1 could create objectionable odors, as explained in subchapter 4.1. However, SCAQMD permits must prevent odor nuisances so the SCAQMD evaluation of permit applications includes the imposition of conditions to minimize such odors. In addition, installing BACT equipment would typically contribute to a reduction in potential odor impacts. Further, SCAQMD Rule 402 prohibits operation of a facility that creates an odor nuisance. Nevertheless, as explained in subchapter 4.1, facilities containing sources receiving permits under the proposed project could result in significant odor impacts. Alternative D could result in the same types of facilities as the proposed project; and therefore would have the same potential to result in significant odor impacts.

Visibility Impacts

5. Visibility. Would the Alternative D create significant aesthetic impacts by resulting in air emissions that substantially degrade the existing visual character or quality of the project surroundings?

Alternative D Effects

Table 6-94 shows predicted visibility and visual range impacts from Alternative D and the proposed project with respect to the state standard. The state standard is a light extinction coefficient of 0.23 per kilometer when relative humidity is less than 70

percent (roughly equivalent to a 10-mile visual range), over an 8-hour averaging period (10 am – 6 pm, PST). Visual range (measured in miles) is provided for informational purposes. The range of without project values for the extinction coefficient predicted for the eastern Basin represented by Riverside-Rubidoux (the worst case) is from 0.063 to 0.067 from 2014 to 2030 over the project timeframe, or one-third of the California standard. The maximum predicted impact on the light extinction coefficient ($.001 \text{ km}^{-1}$) attributable to the proposed project would not cause or contribute to a violation of the state standard and would not be significant. As shown in Table 6-94, visual range impacts for Alternative D are less than or equal to the proposed project.

TABLE 6-94
Proposed Project and Alternative D – Visibility Impacts at Riverside-Rubidoux
Measured in Extinction Coefficient and Visual Range (miles)

	Predicted Extinction Coefficient Without the Project (km^{-1})	Impact on Extinction Coefficient		Visual Range Without Project (miles)	Difference in Miles	
Milestone Year		Proposed Project	Alternative D		Proposed Project	Alternative D
2014	0.0672	0.0002	0.0000	36.512	-0.091	-0.035
2023	0.0629	0.0005	0.0001	39.290	-0.274	-0.055
2030	0.0656	0.0008	0.0001	37.633	-0.469	-0.065

The deciview – an index which incorporates incremental changes in people’s perception of visibility is directly used as the metric for visibility assessment in the federal Regional Haze visibility standard. A 0.5 deciview change is used to assess significance in Class I wilderness areas. Table 6-95 shows the visibility effects of Alternative D and the visibility effects of the proposed project in terms of deciview changes.

TABLE 6-95
Proposed Project and Alternative D – Visibility Impacts at Class-I Wilderness Areas
Measured in Deciview and Visual Range (miles)

Milestone Year Area Impacted	Predicted Deciview Value Without Project	Total Impact (Difference in Deciviews)		Predicted Visual Range Without Project (miles)	Predicted Visual Range With Project (miles)	
2014		Proposed Project	Alternative D		Proposed Project	Alternative D
Agua Tibia	17.709	0.007	0.003	41.463	0.022	-0.011
San Gabriel	16.566	0.014	0.005	49.529	0.058	-0.024

TABLE 6-95 (Concluded)
Proposed Project and Alternative D – Visibility Impacts at Class-I Wilderness Areas
Measured in Deciview and Visual Range (miles)

Milestone Year Area Impacted	Predicted Deciview Value Without Project	Total Impact (Difference in Deciviews)		Predicted Visual Range Without Project (miles)	Predicted Visual Range With Project (miles)	
		Proposed Project	Alternative D		Proposed Project	Alternative D
2014						
Agua Tibia	17.709	0.007	0.003	41.463	0.022	-0.011
San Gabriel	16.566	0.014	0.005	49.529	0.058	-0.024
Cucamonga	16.032	0.012	0.005	50.620	0.049	-0.023
San Gorgonio	13.037	0.006	0.002	67.717	0.023	-0.014
San Jacinto	13.964	0.006	0.002	60.644	0.02	-0.015
Joshua Tree	11.251	0.005	0.002	90.694	0.017	-0.013
2023						
Agua Tibia	17.699	0.02	0.004	41.497	-0.081	-0.016
San Gabriel	16.262	0.042	0.008	50.709	-0.194	-0.039
Cucamonga	15.732	0.03	0.006	51.881	-0.147	-0.03
San Gorgonio	12.986	0.018	0.004	67.866	-0.114	-0.023
San Jacinto	13.940	0.014	0.003	60.735	-0.086	-0.017
Joshua Tree	11.297	0.005	0.002	90.396	-0.075	-0.015
2030						
Agua Tibia	17.781	0.022	0.003	41.161	-0.088	-0.012
San Gabriel	16.321	0.058	0.008	50.405	-0.265	-0.037
Cucamonga	15.865	0.049	0.007	51.224	-0.243	-0.034
San Gorgonio	13.124	0.023	0.003	67.006	-0.138	-0.019
San Jacinto	14.056	0.020	0.003	60.075	-0.119	-0.016
Joshua Tree	11.378	0.017	0.002	89.893	-0.108	-0.015

As shown in Table 6-95, the maximum project impact measured in deciviews would be less than 0.06 for all locations and milestone years, which is not significant. Similarly, implementing Alternative D would also generate a maximum impact measured in deciviews that would be less than 0.05 for all locations and milestone years, which is not significant. Further, visibility impacts from Alternative D would be less than visibility impacts from the proposed project.

Cumulative Effects

The cumulative visibility analysis includes effects of Alternative D, plus effects of the reasonably foreseeable power plant projects, and the additional three years of past sources receiving permits in reliance upon the SCAQMD's offset accounts (2007 through 2009). Table 6-96 presents the visibility effects of the cumulative scenario with Alternative D and the cumulative scenario with the proposed project. The maximum predicted impact on the light extinction coefficient ($.001 \text{ km}^{-1}$) attributable to the cumulative scenario with the proposed project would not cause or contribute to a violation of the state standard and would not be significant. Neither Alternative D nor the proposed project would make a cumulatively considerable contribution to a significant cumulative visibility impact. Visibility impacts from Alternative D would be less for all years and locations than for the proposed project.

TABLE 6-96
Proposed Project and Alternative D – Cumulative Visibility Impacts at Riverside-Rubidoux Measured in Extinction Coefficient and Visual Range (miles)

Milestone Year	Predicted Extinction Coefficient Without the Project (km^{-1})	Impact on Extinction Coefficient		Visual Range Without Project (miles)	Difference in Miles	
		Cumulative with Proposed Project	Cumulative with Alternative D		Cumulative with Proposed Project	Cumulative with Alternative D
2014	0.0672	0.0003	0.0002	36.512	-0.017	-0.130
2023	0.0629	0.0008	0.0004	39.290	-0.456	-0.227
2030	0.0656	0.0008	0.0003	37.633	-0.469	-0.177

The cumulative visibility impacts analysis for class I wilderness areas includes effects of Alternative D, plus effects of the reasonably foreseeable power plant projects, and the additional three years of past stationary source permit application project impacts (2007 through 2009). Table 6-97 presents the visibility effects for class I wilderness areas of the cumulative scenario with Alternative D and the visibility effects of the cumulative scenario with the proposed project in terms of deciview changes. Under the federal standard, a 0.5 deciview change would be considered a significant adverse impact and a cumulatively considerable contribution to a significant cumulative impact. Neither Alternative D nor the proposed project would make a cumulatively considerable contribution to a significant cumulative visibility impact and, therefore, it is concluded that cumulative visibility impacts are not significant. Visibility impacts from Alternative D would be less for all years and locations than for the proposed project.

TABLE 6-97
Proposed Project and Alternative D – Cumulative Visibility Impacts at Class-I
Wilderness Areas Measured in Deciview and Visual Range (miles)

Milestone Year Area Impacted	Predicted Deciview Value Without Project	Total Impact (Difference in Deciviews)		Predicted Visual Range Without Project (miles)	Predicted Visual Range With Project (miles)	
2014		Cumulative with Proposed Project	Cumulative with Alternative D		Cumulative with Proposed Project	Cumulative with Alternative D
Agua Tibia	17.709	0.011	0.008	41.463	-0.044	-0.034
San Gabriel	16.566	0.024	0.018	49.529	-0.108	-0.083
Cucamonga	16.032	0.021	0.016	50.620	-0.101	-0.078
San Gorgonio	13.037	0.012	0.009	67.717	-0.072	-0.055
San Jacinto	13.964	0.009	0.007	60.644	-0.059	-0.045
Joshua Tree	11.251	0.008	0.006	90.694	-0.056	-0.043
2023		Cumulative with Proposed Project	Cumulative with Alternative D		Cumulative with Proposed Project	Cumulative with Alternative D
Agua Tibia	17.699	0.023	0.011	41.497	-0.094	-0.047
San Gabriel	16.262	0.053	0.026	50.709	-0.239	-0.119
Cucamonga	15.732	0.036	0.018	51.881	-0.178	-0.088
San Gorgonio	12.986	0.022	0.011	67.866	-0.139	-0.069
San Jacinto	13.940	0.017	0.008	60.735	-0.105	-0.052
Joshua Tree	11.297	0.014	0.007	90.396	-0.092	-0.046
2030		Cumulative with Proposed Project	Cumulative with Alternative D		Cumulative with Proposed Project	Cumulative with Alternative D
Agua Tibia	17.781	0.025	0.009	41.161	-0.101	-0.038
San Gabriel	16.321	0.066	0.025	50.405	-0.304	-0.114
Cucamonga	15.865	0.057	0.021	51.224	-0.282	-0.106
San Gorgonio	13.124	0.027	0.01	67.006	-0.161	-0.061
San Jacinto	14.056	0.022	0.008	60.075	-0.134	-0.05
Joshua Tree	11.378	0.02	0.008	89.893	-0.125	-0.047

Climate Change

6. Greenhouse Gas Emissions – Would Alternative D result in greenhouse gas emissions that may have a significant impact on the environment, based on any applicable threshold of significance?

The methodology for deriving GHG emission impacts for the project alternatives is the same methodology used for the proposed project, which makes two assumptions. First, SOx emissions were selected as a surrogate to prorate the GHG emissions because SOx emissions result primarily from sulfur contained in fossil fuels. Using a ratio of GHG emissions to SOx emissions from the AQMP inventory, the GHG emissions from the proposed project and project alternatives are calculated using the estimated SOx emissions from the proposed project and multiplying by the ratio factor (see subchapter 4.0 and Appendix D).

Second, an analysis of the statewide inventory was conducted to determine the impact from the remaining GHG pollutants, including HFCs, PFCs and SF6. Combustion GHG emissions are proportional to SOx emissions, while emissions of HFCs, PFCs and SF6 are analyzed as proportional to emissions of CO2, CH4 and N2O, based on the statewide inventory. (See Subchapter 4.0 for additional discussion of the methodology for calculating GHG emissions.). Table 6-98 lists the total GHG emissions from all six GHG pollutants attributed to Alternative D, as well the GHG emissions attributed to the proposed project.

SCAQMD's adopted Tier 3 GHG significance threshold for SCAQMD lead agency projects is 10,000 MT CO2eq per year. Projects with incremental increases below this threshold are not considered to be cumulatively considerable. As shown in Table 6-98, potential GHG emissions from Alternative D exceed 10,000 MT CO2eq per year and are concluded to be significant, but less than the GHG emissions from the proposed project. Therefore, GHG emissions from Alternative D are considered to be cumulatively considerable (CEQA Guidelines §15065(a)(3)).

Table 6-98
Proposed Project and Alternative D – SO_x Emissions
and Greenhouse Gas Emissions

Attainment Year Periods	SO_x Emissions (tons/day)	SO_x Emissions (tons/year)	CO₂, CH₄ and N₂O Emissions (million MT CO₂ eq /year)	HFCs, PFCs and SF₆ Emissions^a (million MT CO₂ eq /year)	TOTAL GHG Emissions^b (million MT CO₂ eq /year)
Proposed Project					
2014	0.16	58.4	4.52	0.29	4.81
2023	0.49	178.85	13.83	0.90	14.74
2030	0.74	270.1	20.89	1.36	22.26
Alternative D					
2014	0.03	10.95	0.85	0.06	0.90
2023	0.04	14.6	1.13	0.07	1.20
2030	0.04	14.6	1.13	0.07	1.20

^a Calculated based on ratio of 0.065 of high GWP/total GHGs. Thus, CO₂, CH₄ and N₂O Emissions x 0.065 = HFCs, PFCs and SF₆ emissions (for example, 4.52 million MT CO₂ eq /year x 0.065 = 0.29 million MT CO₂ eq /year)

^b Total GHG emissions = CO₂, CH₄ and N₂O Emissions + HFCs, PFCs and SF₆ emissions (for example, 4.52 + 0.29 = 4.81 million MT CO₂ eq /year). Total GHG emissions may not be exact due to rounding.

Cumulative Effects

The cumulative analysis includes GHG emissions from Alternative D, plus GHG emissions from the reasonably foreseeable power plant projects, and the additional three years of sources receiving permits in reliance upon the district's offset accounts (2007 through 2009). Table 6-99 presents the GHG emissions from the cumulative scenario with Alternative D and the GHG emissions from the cumulative scenario with the proposed project.

As explained above, GHG emissions from Alternative D are considered to be cumulatively considerable and, therefore, would contribute to significant adverse climate change impacts.

TABLE 6-99
Proposed Project and Alternative D – Cumulative
Greenhouse Gas Emissions

Attainment Year Periods	TOTAL GHG Emissions (million MT CO₂ eq /year)
Cumulative With Proposed Project	
2014	11.98
2023	21.61
2030	29.13
Cumulative With Alternative D	
2014	7.99
2023	8.01
2030	8.07

1.

Alternative E – Limited Offset Availability

1. AQMP Consistency – Would Alternative E Conflict with or Obstruct the Implementation of an Applicable Air Quality Plan?

Like the proposed project, Alternative E would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. Although the AQMP provides strategies for attaining and maintaining the NAAQSs and CAAQSs, it is considered to be a growth accommodating document. The major difference between Alternative E and the proposed project is that Alternative E would only allow the use of offsets in an amount up to 50 percent of the 2007 AQMP growth projections for the relevant industry categories.

Emissions from Alternative E are not expected to conflict with or obstruct the implementation of the AQMP because offsets cannot be issued above the 50 percent emissions caps, which are based on growth projections of the 2007 AQMP for the relevant industry categories. Because regional criteria pollutant emissions from Alternative E are expected to be less than the regional criteria pollutant emissions from the proposed project, the potential for conflicts with the 2007 AQMP would be even less likely.

2. *Criteria Pollutant Emission Standards – Would Alternative E Violate any Air Quality Standard or Contribute to an Existing or Projected Air Quality Violation*

a. *Alternative C – Region-wide emissions of criteria pollutants*

Chapter 4.0 explains that two components make up the emissions attributed to the proposed project. The first component is the amount of net growth in emissions forecasted in the 2007 AQMP for the industry categories that are potentially eligible for permits issued under Rules 1309.1 and Rule 1304. Under the proposed project, growth in stationary source emissions for the industry categories that are potentially eligible for permits issued under Rules 1309.1 and Rule 1304 would be the same as AQMP growth in stationary source emissions for these same categories (Table 6-100). Under Alternative E, growth in stationary source emissions for the industry categories that are potentially eligible for permits issued under Rules 1309.1 and Rule 1304 would be 50 percent of the growth in stationary source emissions from those sources anticipated by the AQMP. The second component includes the emissions from existing sources that relied on offsets from the SCAQMD internal accounts for permits issued prior to July 2010 and that would shut down during the twenty year analysis timeframe. This second component, i.e., shutdown emissions from stationary sources returned to the SCAQMD, would be the same under the proposed project and under Alternative E (Tables 6-100 and 6-101). For the above reasons, emissions impacts from Alternative E would not be a simple 50 percent of the emissions from the proposed project

Table 6-100 shows mass emissions of criteria pollutants from the proposed project, while Table 6-101 shows direct regional emissions from Alternative E. As can be seen comparing the total emissions projected for the proposed project (Table 6-100) to the total emissions projected for Alternative E, criteria pollutant emissions from Alternative E would be significant, but would be less than the emissions from the proposed project.

TABLE 6-100
Proposed Project Stationary Source Emissions –
Growth Projections and Emissions from Shutdowns

Milestone Years	Pollutants					
	VOC	NO _x	SO _x	CO	PM10	PM2.5
100 Percent AQMP Industry Sector Growth Projections - Tons per Day						
2014	5.79	0.52	0.13	0.27	0.82	0.52
2023	18.95	1.33	0.45	2.79	2.80	1.78
2030	29.02	2.26	0.70	4.89	4.40	2.80

TABLE 6-100 (Concluded)
Proposed Project Stationary Source Emissions–
Growth Projections and Emissions from Shutdowns

Milestone Years	Pollutants					
	VOC	NO _x	SO _x	CO	PM ₁₀	PM _{2.5}
Emissions Reductions from Shutdowns of Currently Permitted Sources Obtaining Offsets from SCAQMD Offset Accounts - Tons Per Day						
2014	11.21	0.77	0.03	0.87	0.03	0.02
2023	15.57	1.05	0.04	1.37	0.04	0.03
2030	15.57	1.05	0.04	1.37	0.04	0.03
Total - Tons per Day						
2014	16.99	1.29	0.16	1.14	0.85	0.54
2023	34.52	2.38	0.49	4.16	2.84	1.80
2030	44.59	3.31	0.74	6.26	4.44	2.82
100 Percent AQMP Industry Sector Growth Projections^a - Pounds per Day						
2014	11,580	1,040	260	540	1,640	1,040
2023	37,900	2,660	900	5,580	5,600	3,560
2030	58,040	4,520	1,400	9,780	8,800	5,600
Emissions Reductions from Shutdowns of Currently Permitted Sources Obtaining Offsets from SCAQMD Offset Accounts - Pounds Per Day						
2014	22,420	1,540	60	1,740	60	40
2023	31,140	2,100	80	2,740	80	60
2030	31,140	2,100	80	2,740	80	60
Total - Pounds per Day						
2014	33,980	2,580	320	2,280	1,700	1,080
2023	69,040	4,760	980	8,320	5,680	3,610
2030	89,180	6,620	1,480	12,520	8,880	5,650
Regional Significance Thresholds (Pounds per Day)						
Significance Threshold	55	55	150	550	150	55
Significant?	Yes	Yes	Yes	Yes	Yes	Yes

^a Includes 15 percent factor.

Total emissions may not be exact due to rounding.

TABLE 6-101
Alternative E Stationary Source Emissions

Milestone Years	Pollutants					
	VOC	NO _x	SO _x	CO	PM ₁₀	PM _{2.5}
50 Percent of AQMP Industry Sector Growth Projections - Tons per Day						
2014	2.89	0.26	0.07	0.13	0.41	0.26
2023	9.48	0.66	0.23	1.40	1.40	0.89
2030	14.51	1.13	0.35	2.44	2.20	1.40
Emissions Reductions from Shutdowns of Currently Permitted Sources Obtaining Offsets from SCAQMD Offset Accounts - Tons Per Day						
2014	11.21	0.77	0.03	0.87	0.03	0.02
2023	15.57	1.05	0.04	1.37	0.04	0.03
2030	15.57	1.05	1.05	1.37	0.04	0.03
Total - Tons per Day						
2014	14.1	1.03	0.1	1	0.44	0.28
2023	25.05	1.71	0.27	2.77	1.44	0.91
2030	30.08	2.18	0.39	3.81	2.24	1.42
50 Percent of AQMP Industry Sector Growth Projections - Pounds per Day						
2014	5,780	520	140	265	820	520
2023	18,960	1,320	460	2,800	2,800	1,780
2030	29,020	2,260	700	4,880	4,400	2,800
Emissions Reductions from Shutdowns of Currently Permitted Sources Obtaining Offsets from SCAQMD Offset Accounts - Pounds Per Day						
2014	22,420	1,540	60	1,740	60	40
2023	31,140	2,100	80	2,740	80	60
2030	31,140	2,100	80	2,740	80	60

TABLE 6-101 (Concluded)
Alternative E Stationary Source Emissions

Milestone Years	Pollutants					
	VOC	NO _x	SO _x	CO	PM ₁₀	PM _{2.5}
Total - Pounds per Day						
2014	28,200	2,060	200	2,000	880	560
2023	50,100	3,420	540	5,540	2,880	1,820
2030	60,160	4,360	780	7,620	4,480	2,840
Regional Significance Thresholds (Pounds per Day)						
Significance Threshold	55	55	150	550	150	55
Significant?	Yes	Yes	Yes	Yes	Yes	Yes

Total emissions may not be exact due to rounding.

As indicated in Subchapter 4.1, SCAQMD staff determined that total lead emissions in the district are approximately 18 lbs/day (6,517 lbs/yr) based on fiscal year (FY) 2006-2007 data comprised of 566 facilities in the Basin that reported lead emissions. Lead emission impacts were calculated for the same milestone years evaluated for other emission impacts. As shown in Table 6-102, the maximum net increase in lead emissions by 2030 in the Basin from the proposed project and the cumulative scenario with the proposed project would not exceed the SCAQMD's mass daily significance threshold for lead of three pounds per day. Similarly, Table 6-102 shows that lead emission impacts from Alternative E and from the cumulative scenario with Alternative E would be less-than-significant.

TABLE 6-102
Proposed Project and Alternative E –
Project-Specific and Cumulative Lead Emissions

Milestone Years	Lead (lbs/day)			
	Proposed Project	Cumulative With Proposed Project	Alternative E	Cumulative With Alternative E
2014	0.13	0.33	0.07	0.29
2023	0.45	0.50	0.23	0.36
2030	0.70	0.63	0.35	0.42

Cumulative Effects

As explained in Chapters 4.0 and 4.1, the cumulative impact analysis includes emissions from sources permitted under Rules 1304 and 1309.1 pursuant to the prior version of Rule 1315 and SB 827. In addition, the cumulative impacts analysis includes emissions from three power plants.

Table 6-102 presents the total mass emissions from stationary sources under Alternative E plus the other sources included in the cumulative scenario. As shown in Table 6-102, impacts from Alternative E are cumulatively considerable and, therefore, significant.

TABLE 6-103
Proposed Project and Alternative E Cumulative Stationary Source Mass Emissions

Milestone Years	Pollutant					
	VOC	NO _x	SO _x	CO	PM ₁₀	PM _{2.5}
	Cumulative With Proposed Project – Tons per Day					
2014	23.71	4.7	0.47	10.82	3.47	2.87
2023	40.76	5.64	0.79	14.36	5.29	4.02
2030	50.74	6.61	1.04	16.55	6.79	4.97
Cumulative With Proposed Project Pounds per Day						
2014	47,420	9,400	940	21,640	6,940	5,740
2023	81,520	11,280	1,580	28,720	10,580	8,040
2030	101,480	13,220	2,080	33,100	13,580	9,940

TABLE 6-103 (Concluded)
Proposed Project and Alternative E Cumulative Stationary Source Mass Emissions

Milestone Years	Pollutant					
	VOC	NO _x	SO _x	CO	PM ₁₀	PM _{2.5}
	Cumulative With Alternative E Tons per Day					
2014	20.82	4.44	0.4	10.69	3.06	2.61
2023	31.28	4.98	0.57	12.96	3.89	3.13
2030	36.22	5.48	0.69	14.1	4.59	3.57
Cumulative With Alternative E Pounds per Day						
2014	41,640	8,880	800	21,380	6,120	5,220
2023	62,560	9,960	1,140	25,920	7,780	6,260
2030	72,440	10,960	1,380	28,200	9,180	7,140
Regional Significance Thresholds (Pounds per Day)						
Significance Threshold	55	55	150	550	150	55
Significant?	Yes	Yes	Yes	Yes	Yes	Yes

Modeled Concentrations of Criteria Pollutants

Regional Criteria Pollutant Concentrations – Alternative E

a. Ozone Concentrations

In addition to analyzing project-specific effects of Alternative E in terms of mass regional emissions of criteria pollutants, this PEA includes a supplemental analysis of the contribution of Alternative E to regional concentrations of these same criteria pollutants.

Air quality is expected to improve under future conditions, with or without the proposed project or alternatives. Table 6-104 shows the contributions from Alternative E and the proposed project to the ozone concentrations in the Basin and provides the Coachella Valley for the milestone years of 2014, 2023 and 2030.

As shown in the table, for most milestone years, Alternative E would contribute less to ozone concentration than the proposed project. Another way of looking at the results in Table 6-104 is that for most years Basin and Coachella Valley ozone concentrations improvements foregone from Alternative E are slightly less than the proposed project.

TABLE 6-104
Proposed Project and Alternative E – Contribution to Regional Ozone Concentrations
(Peak 8-hour concentrations)

Year	Basin Average Ozone (ppb)	Basin Maximum Station Ozone (ppb)	Coachella Valley Average Ozone (ppb)	Coachella Valley Maximum Station Ozone (ppb)
Proposed Project				
2014	0.9	1.4	0.5	0.6
2023	1.5	1.9	0.8	1.1
2030	2.6	2.9	1.1	1.3
Alternative E				
2014	0.8	1.2	0.5	0.5
2023	1.1	1.3	0.7	0.7
2030	2.0	2.0	0.9	0.9

b. Particulate Matter Concentrations

Table 6-105 shows the contribution of emissions from Alternative E compared to the proposed project for the predicted annual average and 24-hour (daily) average Basin and Coachella Valley PM2.5 and PM10 concentrations estimated for the milestone years of 2014, 2023 and 2030. As shown in the table, for most milestone years, Alternative E contributes less to regional concentrations of particulate matter than the proposed project. Another way of looking at the results in Table 6-105 is that for most years Basin and Coachella Valley predicted annual average and 24-hour average PM2.5 and PM10 concentration improvements foregone from Alternative E are equal to or slightly less than the proposed project.

TABLE 6-105
Proposed Project and Alternative E – Contributions to Regional PM2.5
and PM10 Concentrations

Year	Basin Annual PM2.5 (µg/m ³)	Basin Annual PM10 (µg/m ³)	Basin Daily PM2.5 (µg/m ³)	Basin Daily PM10 (µg/m ³)	Coachella Valley Annual PM2.5 (µg/m ³)	Coachella Valley Annual PM10 (µg/m ³)	Coachella Valley Daily PM2.5 (µg/m ³)	Coachella Valley Daily PM10 (µg/m ³)
Proposed Project								
2014	0.06	0.12	0.6	0.7	0.01	0.01	0.1	0.1
2023	0.15	0.32	1.2	1.8	0.03	0.03	0.1	0.1
2030	0.21	0.47	1.6	2.5	0.05	0.05	0.2	0.2

TABLE 6-105 (Concluded)
Proposed Project and Alternative E – Contributions to Regional PM_{2.5}
and PM₁₀ Concentrations

Year	Basin Annual PM_{2.5} (µg/m³)	Basin Annual PM₁₀ (µg/m³)	Basin Daily PM_{2.5} (µg/m³)	Basin Daily PM₁₀ (µg/m³)	Coachella Valley Annual PM_{2.5} (µg/m³)	Coachella Valley Annual PM₁₀ (µg/m³)	Coachella Valley Daily PM_{2.5} (µg/m³)	Coachella Valley Daily PM₁₀ (µg/m³)
Alternative E								
2014	0.04	0.09	0.5	0.5	0.01	0.01	0.1	0.1
2023	0.09	0.19	0.9	1.1	0.02	0.02	0.1	0.1
2030	0.12	0.27	1.1	1.5	0.03	0.03	0.1	0.1

c. NO₂ Concentrations

Table 6-106 shows the contributions to regional NO₂ concentrations from Alternative E compared to the proposed project. The regional NO₂ concentration analysis is based on an emissions-weighted approach to estimate the incremental contributions of NO₂ from Alternative E. As Table 6-106 shows, Alternative E and the proposed project would result in NO₂ concentrations of 1 ppb or less for all milestone years, regardless of the averaging time.

TABLE 6-106
Alternative E and the Proposed Project – Contributions to
Regional NO₂ Concentration

Milestone Year	Basin 1-Hour Average NO₂ (ppb)	Basin Annual Average NO₂ (ppb)	Coachella 1-Hour Average NO₂ (ppb)	Coachella 24-Hour Average NO₂^b (ppb)
Proposed Project				
2014	0	0	0	0
2023	1	0	0	0
2030	1	0	0	0
Alternative E				
2014	0	0	0	0
2023	0	0	0	0
2030	1	0	0	0

d. SO₂ Concentrations

Table 6-107 shows the regional contributions to SO₂ concentrations from Alternative E compared to the proposed project. The regional SO₂ concentration analysis is also based on an emissions-weighted approach to estimate the incremental increased contributions of SO₂ from Alternative E. Both Alternative E and the proposed project would result in contributions to SO₂ concentrations in the Basin of 0.04 ton per day, which is less than 0.1 percent of the Basin SO_x emissions, and less than 1.0 ppb for all milestone years, regardless of the averaging time. SO₂ is not measured in the Coachella Valley because there are so few SO₂ emissions sources.

TABLE 6-107
Alternative E and the Proposed Project –
Contributions to Regional SO₂ Concentrations^a

Milestone Year	Basin 1-Hour Average SO₂ (ppb)	Basin 24-Hour Average SO₂ (ppb)	Basin Annual Average SO₂^b (ppb)
Proposed Project			
2014	1	0	0
2023	1	0	0
2030	1	0	0
Alternative E			
2014	0	0	0
2023	1	0	0
2030	1	0	0

^a SO₂ is not measured in the Coachella Valley.

^b Annual average daily SO_x emissions from all point and areas sources are less than 0.04 tons per day, but are rounded up to the nearest whole number.

e. CO Concentrations

Ambient concentrations of carbon monoxide respond linearly to changes in the emissions inventory. Table 6-108 shows the contributions to ambient CO concentrations in the Basin from Alternative E compared to the proposed project. Table 6-108 shows that CO concentrations from Alternative E are less than or equal to concentrations from the proposed project.

TABLE 6-108
Alternative E and the Proposed Project –
Contributions to Regional CO Concentrations

Milestone Year	Change in Concentration (ppm)	
	Proposed Project	Alternative E
2014	0.00	0.00
2023	0.01	0.00
2030	0.01	0.01

Regional Criteria Pollutant Concentrations-- Cumulative Effects

a. Cumulative Ozone Concentrations

In addition to analyzing project-specific contributions of Alternative E to regional pollutant concentrations, this PEA includes an analysis of the combined contributions to regional pollutant concentrations from Alternative E plus other sources receiving permits in reliance upon the SCAQMD's internal offset accounts. Table 6-109 presents the contribution to regional ozone concentrations from such sources in terms of the 8-hour ozone concentrations as between the cumulative scenario with Alternative E compared to the cumulative scenario with the proposed project. As shown in the table, the cumulative scenario with Alternative E results in the same or less contributions to regional ozone concentrations than the proposed project.

TABLE 6-109
Proposed Project and Alternative E Cumulative Scenarios--Contributions to
Regional Ozone Concentrations
(Peak 8-hour Concentrations)

Year	Basin Average Ozone (ppb)	Basin Maximum Station Ozone (ppb)	Coachella Valley Average Ozone (ppb)	Coachella Valley Maximum Station Ozone (ppb)
Cumulative With Proposed Project				
2014	1.1	1.8	0.8	0.8
2023	2.0	2.5	1.0	1.3
2030	3.0	3.5	1.3	1.6
Cumulative With Alternative E				
2014	1.0	1.5	0.6	0.6
2023	1.3	1.3	0.6	0.6
2030	2.2	2.0	0.6	0.7

b. Cumulative Particulate Matter Concentrations

Table 6-110 presents the predicted contribution of regional particulate matter concentrations from Alternative E with the cumulative scenario compared to the proposed project with the cumulative scenario in terms of the contributions to predicted annual average and 24-hour (daily) average Basin and Coachella Valley PM_{2.5} and PM₁₀ concentrations. As shown in Table 6-110, for most milestone years the cumulative scenario with Alternative E would contribute less to regional particulate matter concentrations than the cumulative scenario with the proposed project.

TABLE 6-110

Proposed Project and Alternative E Cumulative Scenarios –Contributions to Regional PM_{2.5} and PM₁₀ Concentrations

Year	Basin Annual PM_{2.5} (µg/m³)	Basin Annual PM₁₀ (µg/m³)	Basin Daily PM_{2.5} (µg/m³)	Basin Daily PM₁₀ (µg/m³)	Coachella Valley Annual PM_{2.5} (µg/m³)	Coachella Valley Annual PM₁₀ (µg/m³)	Coachella Valley Daily PM_{2.5} (µg/m³)	Coachella Valley Daily PM₁₀ (µg/m³)
Cumulative With Proposed Project								
2014	0.18	0.38	1.1	1.8	0.04	0.04	0.1	0.1
2023	0.26	0.57	1.8	2.8	0.06	0.06	0.2	0.2
2030	0.32	0.71	2.2	3.5	0.07	0.07	0.2	0.2
Cumulative With Alternative E								
2014	0.16	0.34	1.0	1.6	0.03	0.03	0.1	0.1
2023	0.20	0.44	1.4	2.1	0.04	0.04	0.1	0.1
2030	0.23	0.51	1.6	2.5	0.05	0.05	0.2	0.2

c. Cumulative NO₂ Concentrations

Table 6-111 shows the contributions to regional cumulative regional NO₂ concentrations from the cumulative scenario with Alternative E compared to the cumulative scenario with proposed project. As Table 6-111 shows, the cumulative scenario with Alternative E would contribute the same amount or less to regional NO₂ concentrations than the cumulative scenario with the proposed project.

TABLE 6-111
Alternative E and the Proposed Project
Cumulative Scenarios – Contributions to Regional NO₂ Concentrations

Milestone Year	Basin 1-Hour Average NO₂ (ppb)	Basin Annual Average NO₂ (ppb)	Coachella 1-Hour Average NO₂ (ppb)	Coachella 24-Hour Average NO₂^b (ppb)
Cumulative with Proposed Project				
2014	1	0	1	0
2023	2	0	1	0
2030	2	0	1	0
Cumulative with Alternative E				
2014	1	0	1	0
2023	1	0	1	0
2030	1	0	1	0

d. Cumulative SO₂ Concentrations

Table 6-112 shows the contributions to cumulative regional SO₂ concentrations from the cumulative scenario with Alternative E compared to the cumulative scenario with the proposed project. As shown in the table, for most milestone years, the cumulative scenario with Alternative E would contribute roughly the same amount to regional SO₂ concentrations as the cumulative scenario with the proposed project.

TABLE 6-112
Alternative E and the Proposed Project Cumulative Scenarios – Contributions to Regional SO₂ Concentrations^a

Milestone Year	Basin 1-Hour Average SO₂ (ppb)	Basin 24-Hour Average SO₂ (ppb)	Basin Annual Average SO₂^b (ppb)
Cumulative with Proposed Project			
2014	1	0	0
2023	1	0	0
2030	1	0	0

TABLE 6-112 (Concluded)
Alternative E and the Proposed Project Cumulative Scenarios – Contributions to Regional SO₂ Concentrations^a

Milestone Year	Basin 1-Hour Average SO ₂ (ppb)	Basin 24-Hour Average SO ₂ (ppb)	Basin Annual Average SO ₂ ^b (ppb)
Cumulative with Alternative E			
2014	1	0	0
2023	1	0	0
2030	1	0	0

^a SO₂ is not measured in the Coachella Valley.

^b Annual average daily SO_x emissions from all point and areas sources are less than 0.04 tons per day, but are rounded up to the nearest whole number.

e. Cumulative CO Concentrations

Table 6-113 shows the contributions to CO concentrations in the Basin from the cumulative scenario with Alternative E compared to the cumulative scenario with the proposed project. Table 6-113 shows that CO concentration from the cumulative scenario with Alternative E are not noticeably less than the concentrations from the cumulative scenario with the proposed project.

TABLE 6-113
Alternative E and the Proposed Project – Cumulative Scenarios Contributions to Regional CO Concentrations

Milestone Year	Change in Concentration (ppm)	
	Cumulative With Proposed Project	Cumulative With Alternative E
2014	0.01	0.01
2023	0.02	0.02
2030	0.02	0.02

Localized Criteria Pollutant Concentrations

Tables 4.1-21 and 4.1-22 in Chapter 4 show that the proposed project has the potential to increase localized PM_{2.5} concentrations at sensitive receptors that may be located near future representative facilities. Similarly, Tables 4.1-23 through 4.1-25 show that the proposed project has the potential to increase local NO₂ concentrations at sensitive receptors that may be located near future representative facilities. The analysis of project-specific localized criteria pollutant impacts prepared for the proposed project

applies to Alternative E for the following reasons. Because most components of Alternative E are identical to the proposed project, the same future representative facilities that would qualify for permits pursuant to Rules 1304 or 1309.1 under the proposed project would qualify for permits under Alternative E. The same five-year database (2003 through 2008) of permits and pending permits in the SCAQMD's overall permit database that was used to analyze future localized impacts of the proposed project would be applicable to Alternative E. The same Source Classification Codes (SCCs) would be applicable: (1) to assigning stack parameters to emission sources for modeling on the basis of source type; and (2) to estimate chemical speciation of permitted emissions reported as PM and organic gases with respect to particle size composition of PM emissions.

Alternative E is similar to the proposed project in most respects except for the following: Alternative E would only allow use of offsets in an amount of up to 50 percent of the AQMP growth projection for sources potentially eligible for permits under Rules 1304 and 1309.1. As a result, fewer affected facilities would be able to obtain permits under Alternative E compared to the proposed project. Although fewer sources would be permitted under Alternative E compared to the proposed project, facilities receiving permits under Alternative E could have the same characteristics as the facilities used to analyze project-specific localized criteria pollutant impacts under the proposed project.

3. Health Effects – Would Alternative E Expose Sensitive Receptors to Substantial Pollutant Concentrations

Region-wide Emissions of Criteria Pollutants—Alternative E

The analysis of Alternative E includes a comparison of the health impacts of Alternative E to the health impacts of the proposed project. Increases in criteria pollutant emissions may result in potential adverse health effects including the following: cardiovascular, neurological, reproductive and respiratory diseases. Health effects have been evaluated by modeling criteria pollutant concentrations, which can provide information on mortality, hospital admissions, emergency room visits, minor restricted activity days, school absence days, loss of work days, and cases of acute/chronic bronchitis, nonfatal heart attacks and adverse upper/lower respiratory conditions. Table 6-114 shows the estimated health effects from the proposed project and Alternative E as a result of exposures to ozone for the milestone years of the analysis. Similarly, Table 6-115 shows the estimated health effects from Alternative E compared to the proposed project as a result of exposure to PM_{2.5} and PM₁₀ during the milestone years analyzed. The impacts shown in Tables 6-114 and 6-115 represent additional health benefits beyond the benefits forecasted in the 2007 AQMP Final Socioeconomic Report that could occur if the project and Alternative E were not implemented, nor replaced by other growth.

TABLE 6-114
Proposed Project and Alternative E – Estimated Ozone Health Impacts –
Health Benefits Foregone

Year	Mortality Deaths (People)	Hospital Admissions (People)	Minor Restricted Activity Days (Days)	School Absences (Days)
Proposed Project				
2014	7	42	29,575	31,172
2023	12	71	49,513	52,186
2030	20	122	85,339	89,947
Alternative E				
2014	6	37	25,826	27,220
2023	9	52	36,608	38,584
2030	16	96	67,117	70,741

TABLE 6-115
Proposed Project and Alternative E – Estimated Annual PM2.5 and
PM10 Health Impacts – Benefits Foregone

Year	Mortality Deaths (People)	Acute Bronchitis (People)	Chronic Bronchitis (People)	Non-fatal Heart Attacks (People)	Upper/Lower Respiratory (People)	Emergency Room Visits	Hospital Admissions (People)	Minor Restricted Activity Days	Work Loss (Days)
Proposed Project									
2014	33	59	18	29	1,262	11	13	23,374	4,074
2023	86	155	46	74	3,283	29	34	60,814	10,601
2030	125	224	66	108	4,763	42	50	88,214	15,377
Alternative E									
2014	23	41	12	20	876	8	9	16,222	2,828
2023	52	93	28	45	1,977	17	21	36,619	6,383
2030	71	128	38	62	2,711	24	28	50,214	8,753

The SCAQMD has not developed significance thresholds for the specific health effects identified in Tables 6-114 and 6-115. However, given the magnitude of the health effects foregone compared to health effect conditions in the absence of Alternative E, SCAQMD staff concludes that Alternative E has the potential to generate significant adverse health effects. Because Alternative E caps debit use at 50 percent of the AQMP

growth assumptions for industry categories with sources potentially eligible to receive permits under Rules 1304 and 1309.1, fewer new or modified sources are expected to be built in the future. As a result, health effects generated by Alternative E are expected to be significant, but less than health effects generated by the proposed project.

Region-wide Emissions of Criteria Pollutants-- Cumulative Effects

The cumulative health impacts analysis include health effects of the Alternative E, plus health effects of the reasonably foreseeable power plant projects, and the effects of the additional three years of past sources permitted in reliance on the SCAQMD's internal offset account (2007 through 2009). Table 6-116 shows the estimated health effects from the proposed project as a result of cumulative exposures to ozone for the milestone years of the analysis. Table 6-117 shows the estimated cumulative health effects from the cumulative scenario with the proposed project compared to the cumulative scenario with Alternative E as a result of exposures to PM2.5 and PM10 for the milestone years of the analysis.

TABLE 6-116
Proposed Project And Alternative E -
Estimated Cumulative Ozone Health Impacts

Year	Mortality Deaths (People)	Hospital Admissions (People)	Minor Restricted Activity Days (Days)	School Absences (Days)
Cumulative With Proposed Project				
2014	9	54	37,662	39,696
2023	15	92	64,780	68,278
2030	24	143	100,213	105,624
Cumulative With Alternative E				
2014	8	47	32,706	34,472
2023	10	61	42,517	44,813
2030	17	102	71,514	75,375

TABLE 6-117
Proposed Project And Alternative E -
Estimated Cumulative Annual PM2.5 and PM10 Health Effects

Year	Mortality Deaths (People)	Acute Bronchitis (People)	Chronic Bronchitis (People)	Non-fatal Heart Attacks (People)	Upper/Lower Respiratory (People)	Emergency Room Visits	Hospital Admissions (People)	Minor Restricted Activity Days	Work Loss (Days)
Cumulative With Proposed Project									
2014	102	184	55	89	3,908	34	41	72,384	12,618
2023	152	273	81	132	5,803	51	61	107,476	18,735
2030	189	341	101	164	7,231	63	76	133,938	23,347
Cumulative With Alternative E									
2014	92	165	49	80	3,510	31	37	65,019	11,334
2023	118	212	63	102	4,496	39	47	83,275	14,516
2030	136	244	72	117	5,177	45	54	95,889	16,715

The SCAQMD has not developed specific significance thresholds for cumulative health impacts. Given the magnitude the cumulative health benefits foregone that would occur if Alternative E were implemented, the contribution to cumulative impacts from Alternative E is concluded to be cumulatively considerable, but less than the proposed project.

Region-wide Emissions of TACs

Basin toxic risks (measured in cancer risk per million person population over a lifetime of exposure, 70 years) were estimated using the MATES-III modeling platform for 2014, 2023 and 2030 model year simulations for Alternative E. For reference, the MATES-III study for 2008 attributed the cancer risk from stationary sources, which include industries, and businesses such as dry cleaners and chrome plating operations at approximately 51 additional cancers in a population of one million individuals while total regional cancer risk from toxic air contaminants was 853 in one million. Table 6-118 summarizes the additional region-wide cancer risk and cancer burden reductions foregone if Alternative E or the proposed project were implemented as compared to conditions without the project. Table 6-118 also shows the contribution to cancer risk and cancer burden from the cumulative scenario with Alternative E and the cumulative scenario with the proposed project.

TABLE 6-118
Proposed Project and Alternative E – Cancer Risk and Cancer
Burden Impacts (Project-specific and Cumulative)

Year	Cancer Risk Reduction Not Achieved^a	Cumulative Cancer Risk Reduction Not Achieved^a	Cancer Burden Reductions Not Achieved	Cumulative Cancer Burden Reductions Not Achieved
Proposed Project				
2014	0.91	3.35	16	59
2023	2.86	5.15	54	96
2030	4.4	6.59	86	129
Alternative E				
2014	0.51	2.96	9	52
2023	1.51	3.80	28	71
2030	2.28	4.47	45	88

^a Additional cases of cancer in a population of one million individuals.

As shown in Table 6-118, neither the proposed project nor Alternative E would generate project-specific or cumulative cancer risk impacts that exceed the SCAQMD's cancer risk significance threshold of 10 in one million (10×10^{-6}).

The proposed project and Alternative E would result in a cancer burden impacts that exceed the SCAQMD's significance threshold of 0.5. Compared to the without project scenario, the proposed project would create an increased cancer burden impact in the year 2030 of 87. Alternative E would create an increased cancer burden impact in the year 2030 of 45. In addition, the cumulative scenarios with both the proposed project and with Alternative E result in significant cancer burdens compared to the without project scenarios. The contributions to cumulative cancer burden impacts from Alternative E are considered to be cumulatively considerable, but less than the proposed project.

A hazard index (HI) is a summation of the hazard (non-cancer) quotients for all chemicals to which an individual is exposed. A hazard index can be measured as a result of chronic (long-term) exposure or acute (short-term) exposure. SCAQMD's significance threshold for non-cancer chronic or acute HI value is 1.0 because if the HI is less than 1.0, it is presumed that no significant adverse human health effects (non-cancer) are expected to occur. Table 6-119 shows the population-weighted project-specific change in chronic HI between the conditions without the project and the proposed project and between the conditions without the project and Alternative E.

Table 6-119 also shows the changes between the conditions without the project and cumulative scenarios with the proposed project and with Alternative E.

Table 6-119
Proposed Project and Alternative E – Chronic and Acute Health
Impacts (Project-specific and Cumulative)

Year	Chronic Health Index Not Achieved	Cumulative Chronic Health Index Not Achieved	Acute Health Index Not Achieved	Cumulative Acute Health Index Not Achieved
Proposed Project				
2014	0	0.02	0.02	0.06
2023	0.02	0.03	0.05	0.09
2030	0.02	0.03	0.08	0.11
Alternative E				
2014	0	0.02	0.01	0.05
2023	0.01	0.02	0.03	0.06
2030	0.01	0.02	0.04	0.08

As shown in Table 6-119, neither the proposed project nor Alternative B would exceed the SCAQMD's acute or chronic HI significance threshold of 1.0. Similarly, Table 6-119 shows that acute and chronic HI impacts from the proposed project with the cumulative scenario and Alternative E with the cumulative scenario would not exceed the HI significance threshold. Therefore neither the proposed project nor Alternative E would generate project-specific or cumulatively considerable non-cancer health risk impacts, while impacts from Alternative E would be equivalent to or less than the proposed project.

Localized Emissions of TACs

Under Alternative E, sources permitted under Rules 1304 and 1309.1 would be subject to the requirements in Rules 1401 and 1402 that limit the cancer risk and non-cancer hazard level, which would limit any potential significant toxic impact from each source. The thresholds in Rule 1401 are the same as the SCAQMD's CEQA significance thresholds for toxics. As a result of these regulatory prohibitions, the issuance of a permit by the SCAQMD to a stationary source of TACs would not result in stationary source emissions that exceed the CEQA significance thresholds for localized health impacts. However, the thresholds contained in Rule 1401 are

applied on a permit-unit basis; as a result, a facility with multiple permitted sources could still exceed the Hazard Index limits in Rule 1401. Such facilities would instead be subject to Rule 1402; under that rule, the allowable cancer burden is the same as under Rule 1401, but the Hazard Index limits for acute and chronic non-cancer toxic impacts are higher (3.0) than the limits under Rule 1401 and thus higher than the applicable CEQA significance thresholds. Therefore, the localized air toxic impacts of the proposed project are considered significant.

Alternative E is similar to the proposed project in most respects except for the following; Alternative E would only allow use of offsets in an amount that is 50 percent of the AQMP growth projection for sources potentially eligible for permits under Rules 1304 and 1309.1. As a result, fewer affected facilities would be able to obtain permits under Alternative E compared to the proposed project. Although fewer sources would be permitted under Alternative E compared to the proposed project, facilities receiving permits under Alternative E could have the same characteristics as the facilities receiving permits under the proposed project. Therefore, Alternative E has the potential to generate adverse localized impacts from emissions of TACs equivalent to significant impacts of the proposed project.

4. Odors – Would Alternative E Create Objectionable Odors Affecting a Substantial Number of People

Some equipment permitted under Rules 1304 and 1309.1 could create objectionable odors, as explained in subchapter 4.1. Evaluation of permit applications includes the imposition of conditions to minimize such odors. In addition, installing BACT equipment would typically contribute to a reduction in potential odor impacts. Further, SCAQMD Rule 402 prohibits operation of a facility that creates an odor nuisance. Nevertheless, as explained in subchapter 4.1, facilities containing sources receiving permits under the proposed project could result in significant odor impacts. Alternative E could result in the same types of facilities as the proposed project; and therefore would have the same potential to result in significant odor impacts.

Visibility Impacts

5. Visibility. Would the Alternative B create significant aesthetic impacts by resulting in air emissions that substantially degrade the existing visual character or quality of the project surroundings?

Alternative E Effects

Table 6-120 shows predicted visibility and visual range impacts from Alternative E and the proposed project with respect to the state standard. The state standard is a light extinction coefficient of 0.23 per kilometer when relative humidity is less than 70

percent (roughly equivalent to a 10-mile visual range), over an 8-hour averaging period (10 am – 6 pm, PST). Visual range (measured in miles) is provided for informational purposes. The range of without project values for the extinction coefficient predicted for the eastern Basin represented by Riverside-Rubidoux (the worst case) is from 0.063 to 0.067 from 2014 to 2030 over the project timeframe, or one-third of the California standard. The maximum predicted impact on the light extinction coefficient ($.001 \text{ km}^{-1}$) attributable to the proposed project would not cause or contribute to a violation of the state standard and is not significant. As shown in Table 6-120, visual range impacts for Alternative E are less than or equal to the proposed project and, therefore, are also concluded to be less than significant.

TABLE 6-120
Proposed Project and Alternative E – Visibility Impacts at Riverside-Rubidoux
Measured in Extinction Coefficient and Visual Range (miles)

	Predicted Extinction Coefficient Without the Project (km^{-1})	Impact on Extinction Coefficient		Visual Range Without Project (miles)	Difference in Miles	
Milestone Year		Proposed Project	Alternative E		Proposed Project	Alternative E
2014	0.0672	0.0002	0.0001	36.512	-0.091	-0.063
2023	0.0629	0.0005	0.0003	39.290	-0.274	-0.165
2030	0.0656	0.0008	0.0005	37.633	-0.469	-0.267

The deciview – an index which incorporates incremental changes in people’s perception of visibility is directly used as the metric for visibility assessment in the federal Regional Haze visibility standard. A 0.5 deciview change is used to assess significance in Class I wilderness areas. Table 6-121 summarizes the visibility effects of Alternative E and the visibility effects of the proposed project in terms of deciview changes.

TABLE 6-121
Proposed Project and Alternative E – Visibility Impacts at Class-I Wilderness Areas
Measured in Deciview and Visual Range (miles)

Milestone Year Area Impacted	Predicted Deciview Value Without Project	Total Impact (Difference in Deciviews)		Predicted Visual Range Without Project (miles)	Predicted Visual Range With Project (miles)	
		Proposed Project	Alternative E		Proposed Project	Alternative E
2014						
Agua Tibia	17.709	0.007	0.005	41.463	0.022	-0.021
San Gabriel	16.566	0.014	0.01	49.529	0.058	-0.044
Cucamonga	16.032	0.012	0.008	50.620	0.049	-0.042
San Gorgonio	13.037	0.006	0.004	67.717	0.023	-0.026
San Jacinto	13.964	0.006	0.004	60.644	0.02	-0.028
Joshua Tree	11.251	0.005	0.003	90.694	0.017	-0.024
2023						
Agua Tibia	17.699	0.02	0.012	41.497	-0.081	-0.049
San Gabriel	16.262	0.042	0.025	50.709	-0.194	-0.117
Cucamonga	15.732	0.03	0.018	51.881	-0.147	-0.089
San Gorgonio	12.986	0.018	0.011	67.866	-0.114	-0.069
San Jacinto	13.940	0.014	0.008	60.735	-0.086	-0.052
Joshua Tree	11.297	0.005	0.007	90.396	-0.075	-0.045
2030						
Agua Tibia	17.781	0.022	0.013	41.161	-0.088	-0.05
San Gabriel	16.321	0.058	0.033	50.405	-0.265	-0.151
Cucamonga	15.865	0.049	0.028	51.224	-0.243	-0.138
San Gorgonio	13.124	0.023	0.013	67.006	-0.138	-0.079
San Jacinto	14.056	0.020	0.011	60.075	-0.119	-0.068
Joshua Tree	11.378	0.017	0.01	89.893	-0.108	-0.061

As shown in Table 6-121, the maximum impact projected for the proposed project measured in deciviews would be less than 0.06 for all locations and milestone years, which is not significant. Similarly, implementing Alternative E would also generate a maximum impact measured in deciviews that would be less than 0.04 for all locations and milestone years, which is not significant. Further, visibility impacts from Alternative E would be less than visibility impacts from the proposed project.

Cumulative Effects

The cumulative visibility impacts analysis includes effects of Alternative E, plus effects of the reasonably foreseeable power plant projects and the additional three years of past sources receiving permits in reliance upon the SCAQMD's offset accounts (2007 through 2009). Table 6-122 presents the visibility effects of the cumulative scenario with Alternative E and the visibility effects of the cumulative scenario with the proposed project. The maximum predicted impact on the light extinction coefficient ($.001 \text{ km}^{-1}$) attributable to the cumulative scenario with the proposed project would not cause or contribute to a violation of the state standard and would not be significant. Neither Alternative E nor the proposed project would make a cumulatively considerable contribution to a significant cumulative visibility impact. Visibility impacts from Alternative E would be less for all years and locations than for the proposed project.

TABLE 6-122
Proposed Project and Alternative E – Cumulative Visibility Impacts at Riverside-
Rubidoux
Measured in Deciview and Visual Range (miles)

	Predicted Extinction Coefficient Without the Project (km^{-1})	Impact on Extinction Coefficient		Visual Range Without Project (miles)	Difference in Miles	
Milestone Year		Cumulative with Proposed Project	Cumulative with Alternative E		Cumulative with Proposed Project	Cumulative with Alternative E
2014	0.0672	0.0003	0.0003	36.512	-0.170	-0.149
2023	0.0629	0.0008	0.0006	39.290	-0.456	-0.341
2030	0.0656	0.0008	0.0006	37.633	-0.469	-0.323

The cumulative visibility impacts analysis for class I wilderness areas includes effects of Alternative E, plus effects of the reasonably foreseeable power plant projects, and the additional three years of sources receiving permits in reliance upon the SCAQMD's offset accounts (2007 through 2009). Table 6-123 presents the visibility effects for class I wilderness areas of the cumulative scenario with Alternative E and the visibility effects of the cumulative scenario with the proposed project in terms of deciview changes. Under the federal standard, a 0.5 deciview change would be considered a significant adverse impact and a cumulatively considerable contribution to a significant cumulative impact. Neither Alternative E nor the proposed project would make a cumulatively considerable contribution to a significant cumulative visibility impact.

TABLE 6-123
Proposed Project and Alternative E – Cumulative Visibility Impacts at Class-I
Wilderness Areas Measured in Deciview and Visual Range (miles)

Milestone Year Area Impacted	Predicted Deciview Value Without Project	Total Project Impact (Difference in Deciviews)		Predicted Visual Range Without Project (miles)	Predicted Visual Range Without Project (miles)	
2014		Cumulative with Proposed Project	Cumulative with Alternative E		Cumulative with Proposed Project	Cumulative with Alternative E
Agua Tibia	17.709	0.011	0.01	41.463	-0.044	-0.039
San Gabriel	16.566	0.024	0.021	49.529	-0.108	-0.095
Cucamonga	16.032	0.021	0.019	50.620	-0.101	-0.089
San Gorgonio	13.037	0.012	0.011	67.717	-0.072	-0.063
San Jacinto	13.964	0.009	0.008	60.644	-0.059	-0.052
Joshua Tree	11.251	0.008	0.007	90.694	-0.056	-0.049
2023		Cumulative with Proposed Project	Cumulative with Alternative E		Cumulative with Proposed Project	Cumulative with Alternative E
Agua Tibia	17.699	0.023	0.017	41.497	-0.094	-0.07
San Gabriel	16.262	0.053	0.04	50.709	-0.239	-0.179
Cucamonga	15.732	0.036	0.027	51.881	-0.178	-0.133
San Gorgonio	12.986	0.022	0.016	67.866	-0.139	-0.104
San Jacinto	13.940	0.017	0.013	60.735	-0.105	-0.078
Joshua Tree	11.297	0.014	0.01	90.396	-0.092	-0.069
2030		Cumulative with Proposed Project	Cumulative with Alternative E		Cumulative with Proposed Project	Cumulative with Alternative E
Agua Tibia	17.781	0.025	0.017	41.161	-0.101	-0.069
San Gabriel	16.321	0.066	0.045	50.405	-0.304	-0.209
Cucamonga	15.865	0.057	0.039	51.224	-0.282	-0.194
San Gorgonio	13.124	0.027	0.019	67.006	-0.161	-0.111
San Jacinto	14.056	0.022	0.015	60.075	-0.134	-0.092
Joshua Tree	11.378	0.02	0.014	89.893	-0.125	-0.086

Climate Change

6. Greenhouse Gas Emissions – Would Alternative B result in greenhouse gas emissions that may have a significant impact on the environment, based on any applicable threshold of significance?

The methodology for deriving GHG emission impacts for the project alternatives is the same methodology used for the proposed project, which makes two assumptions. First, SOx emissions were selected as a surrogate to prorate the GHG emissions because SOx emissions result primarily from sulfur contained in fossil fuels. Using a ratio of GHG emissions to SOx emissions from the AQMP inventory, the GHG emissions from the proposed project and project alternatives are calculated using the estimated SOx emissions from the proposed project and multiplying by the ratio factor (see subchapter 4.0 and Appendix D).

Second, an analysis of the statewide inventory was conducted to determine the impact from the remaining GHG pollutants, including HFCs, PFCs and SF6. Combustion GHG emissions are proportional to SOx emissions, while emissions of HFCs, PFCs and SF6 are analyzed as proportional to emissions of CO2, CH4 and N2O, based on the statewide inventory. (See Subchapter 4.0 for additional discussion of the methodology for calculating GHG emissions.). Table 6-124 lists the total GHG emissions from all six GHG pollutants attributed to Alternative E, as well as the GHG emissions attributed to the proposed project.

TABLE 6-124
Proposed Project and Alternative E – SOx Emissions and Greenhouse Gas Emissions

Attainment Year Periods	SOx Emissions (tons/day)	SOx Emissions (tons/year)	CO2, CH4 and N2O Emissions (million MT CO₂ eq /year)	HFCs, PFCs and SF6 Emissions^a (million MT CO₂ eq /year)	TOTAL GHG Emissions^b (million MT CO₂ eq /year)
Proposed Project					
2014	0.16	58.4	4.52	0.29	4.81
2023	0.49	178.85	13.83	0.90	14.74
2030	0.74	270.1	20.89	1.36	22.26

TABLE 6-124 (Concluded)
Proposed Project and Alternative E – SO_x Emissions and Greenhouse Gas Emissions

Attainment Year Periods	SO_x Emissions (tons/day)	SO_x Emissions (tons/year)	CO₂, CH₄ and N₂O Emissions (million MT CO₂ eq /year)	HFCs, PFCs and SF₆ Emissions^a (million MT CO₂ eq /year)	TOTAL GHG Emissions^b (million MT CO₂ eq /year)
Alternative E					
2014	0.1	36.5	2.82	0.18	3.01
2023	0.27	98.55	7.62	0.50	8.12
2030	0.39	142.35	11.01	0.72	11.72

^a Calculated based on ratio of 0.065 of high GWP/total GHGs. Thus, CO₂, CH₄ and N₂O Emissions x 0.065 = HFCs, PFCs and SF₆ emissions (for example, 4.52 million MT CO₂ eq /year x 0.065 = 0.29 million MT CO₂ eq /year)

^b Total GHG emissions = CO₂, CH₄ and N₂O Emissions + HFCs, PFCs and SF₆ emissions (for example, 4.52 + 0.29 = 4.81 million MT CO₂ eq /year). Total GHG emissions may not be exact due to rounding.

SCAQMD's adopted Tier 3 GHG significance threshold for SCAQMD lead agency projects is 10,000 MT CO₂eq per year. Projects with incremental increases below this threshold are not considered to be cumulatively considerable. As shown in Table 6-124, potential GHG emissions from Alternative E exceed 10,000 MT CO₂eq per year and are concluded to be significant, but less than the GHG emissions from the proposed project. Therefore, GHG emissions from are considered to be cumulatively considerable (CEQA Guidelines §15065(a)(3)), and are expected to contribute to significant adverse climate change impacts.

Cumulative Effects

The cumulative analysis includes GHG emissions from Alternative E, plus GHG emissions from the reasonably foreseeable power plant projects, and the additional three years of past cumulative impacts (2007 through 2009). Table 6-125 presents the GHG emissions from the cumulative scenario with Alternative E and the GHG emissions from the cumulative scenario with the proposed project.

As explained above, cumulative GHG emissions from Alternative E are considered to be cumulatively considerable and, therefore, would contribute to significant adverse climate change impacts.

TABLE 6-125
Proposed Project and Alternative E – Cumulative Greenhouse Gas Emissions

Attainment Year Periods	TOTAL GHG Emissions (million MT CO₂ eq /year)
Cumulative With Proposed Project	
2007-2014	11.98
2007-2023	21.61
2007-2030	29.13
Cumulative With Alternative E	
2007-2014	9.96
2007-2023	14.99
2007-2030	18.60

1.

LEAST TOXIC ALTERNATIVE

In accordance with SCAQMD’s policy document, Environmental Justice Program Enhancements for FY 2002-03, Enhancement II-1 recommends that all EIR equivalent CEQA documents for SCAQMD regulatory projects include an analysis of a potentially feasible project alternative with the lowest air toxics emissions. In other words, at least one alternative, where feasible, shall be considered from a “least harmful” perspective with regard to hazardous air pollutant emissions.

The proposed project, may result in siting, constructing and operating new and modified sources (see Chapter 5). Future facilities that qualify for exemptions pursuant to Rule 1304 or that are eligible for offsets from the priority reserve could emit air toxics in addition to VOCs and criteria pollutants, although air toxics would continue to be stringently regulated pursuant to Regulation XIV rules, in particular Rule 1401 – New Source Review of Toxic Air Contaminants.

Projects exempt from offsets pursuant to Rule 1304 or that obtain offsets pursuant to Rule 1309.1 vary in size, location and operation type. Because toxicity of different air toxics may vary widely, toxic emissions are not necessarily size dependent and could be emitted from both small and large businesses.

With regard to localized air toxics effects, all alternatives have the potential to generate significant cancer and non-cancer health effects because it is expected that similar types and sizes of facilities would be constructed in the future under the proposed project and all alternatives.

With regard to a regional evaluation of cancer and non-cancer effects of the alternatives shown in Tables 6-126, 6-127, and 6-128, Alternative A, the No Project Alternative is the least toxic alternative. Of the remaining alternatives, Alternative D is concluded to be the least toxic alternative for the following reasons. Alternative D is projected to generate the lowest regional cancer risk and cancer burden for the most number of milestone years. Similarly, Alternative D has lower or equivalent regional chronic hazard impacts for more milestone years than the other alternatives. Based on the results in Tables 6-126 through 6-128, Alternative D is considered to be the least toxic alternative because it has the lowest overall air toxics impacts for most milestone years.

CONCLUSION AND ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Pursuant to CEQA Guidelines §15126.6(e)(1), a CEQA document should identify an environmentally superior alternative. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. The following paragraphs discuss the various characteristics of the project alternatives and identify the environmentally superior alternative.

Environmentally, adopting Alternative A would avoid the significant adverse air quality and greenhouse gas impacts that are projected to occur under the proposed project. However, since future affected facilities would not be able to modernize their equipment, some beneficial air quality projects also would not occur. Further, as discussed in Chapter 7, Alternative A would result in greater effects on water supply, wastewater treatment capacity and public services than the proposed project because Alternative A would hinder construction of new and expanded essential public services to accommodate anticipated population growth.

Table 6-126
Alternatives' Cancer and Non-cancer Impacts – 2014

		Cancer Risk Reduction not Achieved^a	Cancer Burden Reduction not Achieved	Chronic Health Index Not Achieved	Acute Health Index Not Achieved
Propose Project	Project-specific	0.91	16	0	0.02
	Cumulative	3.35	59	0.02	0.06
Alternative A ^b	Project-specific	0	0	0	0
	Cumulative				
Alternative B	Project-specific	0.22	4	0	0.01
	Cumulative	2.68	47	0.01	0.05
Alternative C	Project-specific	0.82	14	0	0.02
	Cumulative	3.26	57	0.02	0.06
Alternative D	Project-specific	0.12	2	0.00	0.00
	Cumulative	2.56	45	0.01	0.04
Alternative E	Project-specific	0.51	9	0.00	0.01
	Cumulative	2.96	52	0.02	0.05

^a Additional cases of cancer in a population of one million individuals.

^b Alternative A is considered to be the baseline, so cancer and non-cancer impacts are considered to be zero, while the impacts of the proposed project represent benefits forgone compared to Alternative A.

Table 6-127
Alternatives' Cancer and Non-cancer Impacts – 2023

		Cancer Risk Reduction not Achieved ^a	Cancer Burden Reduction not Achieved	Chronic Health Index Not Achieved	Acute Health Index Not Achieved
Proposed Project	Project-specific	2.86	54	0.02	0.05
	Cumulative	5.15	96	0.03	0.09
Alternative A ^b	Project-specific	0	0	0	0
Alternative B	Project-specific	0.52	10	0	0.01
	Cumulative	2.80	52	0.01	0.05
Alternative C	Project-specific	2.54	48	0.01	0.04
	Cumulative	4.83	90	0.03	0.08
Alternative D	Project-specific	0.16	3	0.00	0.00
	Cumulative	2.44	46	0.01	0.04
Alternative E	Project-specific	1.51	28	0.01	0.03
	Cumulative	3.80	71	0.02	0.06

^a Additional cases of cancer in a population of one million individuals.

^b Alternative A is considered to be the baseline, so cancer and non-cancer impacts are considered to be zero, while the impacts of the proposed project represent benefits forgone compared to Alternative A.

Table 6-128
Alternatives' Cancer^a and Non-cancer Impacts – 2030

		Cancer Risk Reduction not Achieved	Cancer Burden Reduction not Achieved	Chronic Health Index Not Achieved	Acute Health Index Not Achieved
Proposed Project	Project-specific	4.40	86	0.02	0.08
	Cumulative	6.59	129	0.03	0.11
Alternative A ^b	Project-specific	0	0	0	0
Alternative B	Project-specific	0.78	15	0	0.02
	Cumulative	2.97	58	0.02	0.05
Alternative C	Project-specific	3.91	77	0.02	0.07
	Cumulative	6.09	119	0.03	0.10
Alternative D	Project-specific	0.16	3	0.00	0.00
	Cumulative	2.34	46	0.01	0.04
Alternative E	Project-specific	2.28	45	0.01	0.04
	Cumulative	4.47	88	0.02	0.08

^a Additional cases of cancer in a population of one million individuals.

^b Alternative A is considered to be the baseline, so cancer and non-cancer impacts are considered to be zero, while the impacts of the proposed project represent benefits forgone compared to Alternative A.

Since the No Project Alternative is concluded to be the environmentally superior alternative, an environmentally superior alternative must be identified among the remaining alternatives.

Implementing Alternative B could potentially generate a little over three million dollars to more than 400 million dollars of user fees per pollutant, depending on the milestone year period and through 2030 (Table 6-23). User fees would be used to fund emission

reduction projects. Emission reductions achieved using the offset user fees would not be allowed to create credits that would be returned to the SCAQMD's offset accounts to replace offsets used to demonstrate equivalency with federal offset requirements. Instead, emission reductions generated by the offset user fees would be retired for the benefit of the environment. Alternative B has the potential to produce substantial air quality (see, for example Tables 6-25, 6-26, and 6-129) benefits as well as visibility, and greenhouse gas benefits compared to the proposed project and the remaining project alternatives.

With regard to indirect impacts for the non-air quality topic areas, Alternative B would generate greater impacts than the proposed project for the following reasons. Although Alternative B would result in providing offsets for the same number and types of facilities as the proposed project, emission reduction projects funded by the user fees could also generate additional indirect impacts to each environmental topic area. Significant adverse indirect impacts from Alternative B are also expected to be greater than the indirect impacts from Alternative C, D, and E as explained below.

TABLE 6-129
Comparison of the Proposed Project and the Alternatives'
Stationary Source Emissions (Tons per Day)

Milestone Years	Pollutant					
	VOC	NO _x	SO _x	CO	PM ₁₀	PM _{2.5}
Proposed Project						
2014	16.99	1.29	0.16	1.14	0.85	0.54
2023	34.52	2.38	0.49	4.16	2.84	1.8
2030	44.59	3.31	0.74	6.26	4.44	2.82
Alternative A						
2014	0	0	0	0	0	0
2023	0	0	0	0	0	0
2030	0	0	0	0	0	0
Alternative B						
2014	16.78	1.16	0.11	1.14	0.10	0.06
2023	33.83	2.06	0.35	4.16	0.28	0.28
2030	43.52	2.77	0.51	6.26	0.48	0.30

TABLE 6-129 (Concluded)
Comparison of the Proposed Project and the Alternatives'
Stationary Source Emissions (Tons per Day)

Alternative C						
2014	15.61	1.17	0.13	1.1	0.76	0.48
2023	29.98	2.07	0.4	3.77	2.53	1.61
2030	37.63	2.79	0.59	5.57	3.96	2.51
Alternative D - Tons per Day						
2014	11.21	0.77	0.03	0.87	0.03	0.02
2023	15.56	1.05	0.04	1.37	0.04	0.03
2030	15.56	1.05	0.04	1.37	0.04	0.03
Alternative E - Tons per Day						
2014	14.1	1.03	0.1	1	0.44	0.28
2023	25.04	1.71	0.27	2.77	1.44	0.91
2030	30.08	2.18	0.39	3.81	2.24	1.42

The main difference between Alternative C and the proposed project is that Alternative C would prohibit the SCAQMD from offsetting emission increases from large businesses using offsets from the SCAQMD's internal offset accounts. In effect, this means that large business would no longer qualify for exemptions from federal offset requirements pursuant to Rules 1304 and 1309.1. Air quality and greenhouse gas impacts resulting from Alternative C, would be less than the proposed project, but still significant, because fewer facilities would qualify for the exemptions from federal offset requirements in Rules 1304 and 1309.1. The air quality, health, greenhouse gas impacts resulting from Alternative C would be greater than the air quality, health, and greenhouse gas impacts from Alternatives B, D and E but less than the proposed project.

The analysis of indirect impacts in Chapter 7 assumes that the magnitude of the indirect impacts is positively correlated with the number of facilities receiving permits pursuant to Rule 1304. As a result, since Alternative C would prohibit applying offsets from its offset accounts to large businesses, is assumed that fewer facilities would be constructed and operated in the future that could generate significant adverse indirect environmental impacts.

As with other project alternatives, Alternative D differs from the proposed project in one major aspect. Alternative D would eliminate the SCAQMD's existing offset accounts and only credits generated starting in the year 2009 and beyond could be used as offsets

for facilities that qualify for the offset exemption in Rules 1304 and 1309.1. Offsets for facilities seeking an exemption from offset requirements pursuant to Rules 1304 and 1309.1 could only be provided in the amounts that accrue each year. If offsets are not available in the amounts that would satisfy all facility operators seeking offset exemptions, permitting for those facilities where the SCAQMD cannot provide sufficient offsets would cease until such time as offsets become available. If all offsets are not used in the year they are generated, they would roll-over to the next year. Air quality information for Alternative D shows that it has the least air quality, visibility, and greenhouse gas impacts among the alternatives, other than Alternative A. Alternative D would reduce impacts from SO_x and PM₁₀ emissions to a less-than-significant level.

Alternative D would also result in fewer indirect impacts than the other project alternatives because it would not enable growth in the industry categories that otherwise would receive permits under Rules 1304 and 1309.1. However, Alternative D would result in greater cumulative effects on water supply, wastewater treatment capacity and public services than the proposed project and other project alternatives because it would hinder construction of new and expanded essential public services needed to accommodate population growth.

The main difference between Alternative E and the proposed project is that Alternative E would establish an offset cap equal to 50 percent of the offset cap established for the proposed project. As shown in tables 6-100 and 6-101, emissions from the AQMP growth projections would be 50 percent of the AQMP growth projections of the proposed project, while emissions reductions from shutdowns of currently permitted sources obtaining offsets from SCAQMD offset accounts would be the same for both Alternative E and the proposed project. Based on the information in Tables 6-100, 6-101, and 6-129, fewer offsets would be available to provide exemptions from federal offset requirements pursuant to Rules 1304 and 1309.1. As a result, fewer future facilities would be constructed and built compared to the proposed project. Alternative E would have fewer air quality impacts than the proposed project and Alternative C.

With regard to indirect impacts, Alternative E would result in fewer facilities constructed in the future compared to the proposed project and Alternatives B and C. As a result indirect impacts from Alternative E would be less compared to the proposed project and Alternatives B and C. However, because Alternative E would restrict use of offsets available to essential public services, it could result in greater impacts to water supply, wastewater treatment capacity and public services than the proposed project, and Alternatives B and C.

Based on the above information, Alternative D is concluded to be the environmentally superior alternative. Alternative D has the potential to result in substantially lower air quality, health, and greenhouse gas impacts for most milestone years than the proposed project and the other project alternatives.

CHAPTER 7

ALTERNATIVES -- INDIRECT IMPACTS

Introduction

Alternatives Rejected as Infeasible

Description of Alternatives

Evaluation of the Comparative Effects of the Project Alternatives

INTRODUCTION

As indicated in Chapter 6, this chapter provides a discussion of indirect impacts of the alternatives, as compared to the proposed project. To provide an analysis of impacts from the alternatives consistent with the analysis of impacts from the proposed project, the analysis of air quality, visibility and greenhouse gas impacts from the project alternatives is included in Chapter 6 (see Subchapter 4.1 of this PEA for the analysis of the same impacts from the proposed project). The analysis of indirect impacts from the project alternatives can be found in this chapter of the PEA (see the subchapters in Chapter 5 of this PEA for the analysis of indirect impacts from the proposed project). This format enables the reader to compare all environmental effects of the project alternatives with all environmental effects of the proposed project.

Chapter 6 includes discussions of the various CEQA requirements for an alternatives analysis. Rather than repeat information in Chapter 6, the descriptions of the alternatives have been summarized in the following subsections.

Alternatives Rejected as Infeasible

Chapter 6 explains why the following alternatives have been considered, but have not been carried forward for more detailed analysis:

- Prohibit the Use of Offsets from Shutdowns or Reductions at Minor Sources to Demonstrate Equivalency with Federal Offset Requirements;
- Pre-Rule 1315 Offset Tracking;
- Fossil Fueled Power Plant Project Alternative;
- Other Alternatives Suggested by the Superior Court; and
- Issue Offsets to Priority Projects First.

The main reasons the alternatives were rejected as infeasible was because they were not consistent with, or would not achieve, the project objectives. In addition, some of the rejected alternatives would be expected to avoid few impacts, if any, compared to the proposed project.

DESCRIPTION OF PROJECT ALTERNATIVES

Detailed descriptions of the project alternatives are provided in Chapter 6. Summaries of the components of the proposed project and the five project alternatives are provided in Tables 6-3 in Chapter 6 and 7-1. As a reminder, when considering approval of the proposed project, the SCAQMD's Governing Board may choose all of or portions of any of the alternatives analyzed as well as variations on the alternatives.

TABLE 7-1
Comparison of Key Components of the Proposed Project to the Alternatives

Proposed Project (Key Components)	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limit Offset Availability
<i>Project Description Summaries</i>					
PR 1315 would specify the tracking system used to demonstrate equivalency with federal offset requirements. It would track offset use and establish caps on net emissions increases from issuance of permits under Rules 1304 and 1309.1 based on 2007 AQMP growth projections for applicable industry categories.	Neither the proposed project nor Alternatives B through D adopted. SB827 would allow issuance of permits under Rules 1309.1 and 1304 from January 1, 2010 until May 1, 2012, at which time permits would not be issued under Rules 1309.1 or 1304. AB 1318 and pending SB 388 could allow credits transferred to qualifying power plants until 5/1/12 and 1/1/13, respectively.	Would specify the tracking system to demonstrate equivalency with federal offset requirements. Offsets subject to fees for large businesses that qualify for permits under Rule 1304. Fees would be used for emission reduction projects. Otherwise, includes same components including caps on net emission increases. Mitigation projects could not create new offsets.	Would establish a tracking system to demonstrate equivalency with federal offset requirements. Large businesses would be prohibited from accessing the SCAQMD's internal accounts. Otherwise, includes same components as proposed project, including caps on net emission increases.	Would establish a tracking system to demonstrate equivalency with federal offset requirements. Would eliminate the SCAQMD's existing internal account balances. SCAQMD's internal accounts would only be funded by credits generated starting in 2009. Otherwise, includes same components as proposed project, including caps on net emission increases.	Would specify the tracking system to demonstrate equivalency with federal offset requirements. Caps on net emission increases established at 50% of the 2007 AQMP growth projections for the applicable industry categories. . Otherwise, includes same components as proposed project.
<i>Purpose (Subdivision a)</i>					
Maintain ability to continue to issue permits to major and minor sources for facility modernization and to accommodate population growth (implement Rules 1304 and 1309.1), memorialize procedures for demonstrating equivalency; & demonstrate sufficient credits available to demonstrate equivalency.	Rule 1315 not adopted, so sources could not obtain offsets from Rules 1309.1 or 1304 after May 1, 2012. SCAQMD would not maintain internal accounts.	Same as proposed project.	Same as proposed project. However, large businesses would no longer qualify for offset exemptions pursuant to Rule 1304.	Same as proposed project. However, only offsets generated from the year 2009 on could be used.	Same as proposed project.

TABLE 7-1 (Continued)
Comparison of Key Components of the Proposed Project to the Alternatives

Proposed Project Key Components	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
<i>Definitions Subdivision b)</i>					
Community Bank Net Emission Increase Offset Ratio Orphan Reduction Orphan Shutdown Priority Reserve Shortfall	Rule 1315 not adopted so no definitions	Same as proposed project, plus: Large Business	Same as proposed project, plus: Large Business	Same as proposed project.	Same as proposed project.
<i>Federal NSR Equivalency (Subdivision c)</i>					
Maintain a separate District offset account for each federal nonattainment air contaminant	Rule 1315 not adopted so no tracking of federal offset accounts.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.
Annually track all emissions offsets provided to major sources from internal accounts.	Rule 1315 not adopted so no tracking of federal offset accounts.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.
Annually track all eligible credits deposited in SCAQMD's internal accounts	No annual tracking because equivalency demonstration with federal offset requirements not necessary as SCAQMD would not provide offsets pursuant to Rules 1304 and 1309.1 and would not maintain internal accounts.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.

TABLE 7-1 (Continued)
Comparison of Key Components of the Proposed Project to the Alternatives

Proposed Project Key Components	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
Deposit appropriate emission reductions in SCAQMD's internal accounts.	Emission reductions no longer deposited into SCAQMD's internal accounts	Same as proposed project.	Same as proposed project.	Eliminate credits in existing internal accounts. Only deposit credits from major and minor sources generated after 2009.	Same as proposed project.
All unused credits in the federal offset accounts shall be discounted annually.	No tracking of federal offset accounts.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.
<i>Net Emission Increases (Subdivision d)</i>					
All increases in potential to emit (PTE) that occur at minor sources pursuant to Rule 1304 and Rule 1309.1 shall be tracked and not constitute debits	Tracking increases in PTE not necessary.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.
Cumulative net emission increases shall be included in the Executive Officer's report to the Governing Board	No Report to the Governing Board required.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.

TABLE 7-1 (Continued)
Comparison of Key Components of the Proposed Project to the Alternatives

Proposed Project Key Components	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
<i>Federal NSR Equivalency Reports (Subdivision e)</i>					
The Executive Officer shall aggregate and track offsets debited from and offsets provided to the SCAQMD offset accounts into specific reporting periods	No offsets from or credits to SCAQMD offset accounts and no reporting periods.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.
Complete Preliminary Determination of Equivalency (PDE) with federal non-attainment NSR offset requirements 12 months after reporting period.	PDE is not required.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.
Complete Final Determination of Equivalency (FDE) with federal non-attainment NSR offset requirements for any account(s) for which the PDE did not demonstrate equivalence with 18 months after reporting period.	FDE is not required.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.

TABLE 7-1 (Continued)
Comparison of Key Components of the Proposed Project to the Alternatives

Proposed Project Key Components	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
<i>Projections of Federal Offset Balances (Subdivision f)</i>					
PDEs & FDEs shall also include projections of the federal offset account balances at the end of each of the two subsequent reporting periods.	PDE and FDE are not required.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.
<i>Equivalency Backstop Provisions (subdivision g)</i>					
Discontinue funding the Priority Reserve if the most recent actual District offset account balances (from FDE) demonstrate a shortfall for any air contaminant.	Internal accounts no longer used so no shortfalls will occur.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.
Resume funding upon completion of FDE demonstrating no more shortfalls.	Internal accounts no longer used so no FDE required to demonstrate no shortfall.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.
Discontinue issuing permits that rely on 1304 or 1309.1 for the air pollutants that have a shortfall.	Internal accounts no longer used so no more shortfalls.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.

TABLE 7-1 (Continued)
Comparison of Key Components of the Proposed Project to the Alternatives

Proposed Project Key Components	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
If an FDE demonstrates that a shortfall exists in any of the SCAQMD offset accounts or a subdivision (f) projection predicts a shortfall, the Executive Officer shall prepare a report to the Governing Board recommending implementation of one or more backstop provisions as needed to correct the shortfall	No FDE required.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.
<i>CEQA Backstop Provisions (subdivision h)</i>					
If the cumulative net emission increase of a nonattainment air contaminant exceeds the cap for that air contaminant, the Executive Officer shall discontinue issuing permits to construct and permits to operate that rely on new offsets from SCAQMD's internal accounts.	No internal accounts, therefore, no cumulative net increases from affected facilities.	Same as proposed project	Same as proposed project	Same as proposed project.	Same as proposed project.

TABLE 7-1 (Continued)
Comparison of Key Components of the Proposed Project to the Alternatives

Proposed Project Key Components	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
Pollutant-specific cumulative net emission increase thresholds are established based on the 2007 AQMP-forecasted growth in emissions from industry categories potentially eligible to receive permits under Rules 1304 and 1309.1	No air contaminant-specific cumulative net emission increase thresholds established	Same as proposed project.	Same as proposed project.	Same as proposed project.	Pollutant-specific cumulative net emission increase thresholds are established based on 50% of the 2007 AQMP-forecasted growth in emissions from industry categories potentially eligible to receive permits under Rules 1304 and 1309.1
<i>State Implementation Plan Submittals (subdivision i)</i>					
Net emission increase definition, cumulative net emission increases & projected cumulative net emission increases, as well as, Rule 1315 requirements for net emissions increases and CEQA backstop provisions shall not be submitted for inclusion in the SIP.	No backstop provisions.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project.
<i>Alternatives Components</i>					
Cumulative net emissions increases capped at 2007 AQMP growth projections for industry categories potentially eligible to receive permits under Rules 1304 and 1309.1.	No debits available.	Same as proposed project.	Same as proposed project.	Same as proposed project.	Same as proposed project except caps at 50 % of 2007 AQMP growth projections for industry categories potentially eligible to receive permits under Rules 1304 and 1309.1.

TABLE 7-1 (Concluded)
Comparison of Key Components of the Proposed Project to the Alternatives

Proposed Project Key Components	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
All credits generated each year available as offsets in the future	No credits available.	Same as proposed project.	Same as proposed project.	Existing balances in internal accounts eliminated. Only credits generated from 2009 on could be used as offsets in the future.	Same as proposed project.
Large businesses have access to offsets in the SCAQMD's internal accounts (no change from pre-Rule 1315 situation).	No offset accounts available to any businesses.	Large businesses must pay a fee to access the SCAQMD's internal accounts to qualify for Rule 1304 exemptions.	Large businesses prohibited from access to Rule 1304 exemption from offsets, therefore, offsets unavailable for these sources.	Same as proposed project.	Same as proposed project.
No Fees for large businesses.	No fees.	Includes large business user fee for access to Rule 1304 exemptions; fees to be used for emission reduction projects.	No large business user fees as large businesses would not qualify for exemptions under Rule 1304.	Same as proposed project.	Same as proposed project.
<i>Proposed Amended Rule 1309.2 – No Longer Part of the Proposed Project, Rescinded February 5, 2010</i>					

In this chapter (indirect impacts of the alternatives), the No-Project Alternative includes the impacts of permits approved pursuant to SB 827 until that bill's sunset date of May 1, 2012. SB 827 is independent of the proposed project and will remain in effect regardless of whether the project is adopted. SB 827 authorizes the SCAQMD to issue permits in reliance on its internal accounts for sources that are exempt from offsets under SCAQMD Rule 1304 and for projects that are essential public services receiving offsets from the Priority Reserve under Rule 1309.1. These are the same types of sources that will be eligible to receive offsets pursuant to those two rules if Rule 1315 is readopted pursuant to the project and approved by EPA. Therefore, the indirect impacts of the no-project alternative are similar to the indirect impacts of the project until May 1, 2012.

By contrast, in Chapter 4 (direct impacts of the project), and Chapter 6 (direct impacts of the alternatives), the analysis of the No-Project alternative does not include air quality, visibility and greenhouse gas impacts of approving permits under SB 827 from July 1, 2010 forward. Instead, all air quality, visibility and greenhouse gas impacts occurring from permits relying on the SCAQMD's internal accounts beginning in July 2010 are attributed to the proposed project.

EVALUATION OF THE COMPARATIVE EFFECTS OF THE PROJECT ALTERNATIVES

Indirect impacts from the proposed project (Chapter 5) were concluded to be significant for all topic areas either because one or more CEQA documents for representative projects concluded there would be significant impacts or because there could be unique circumstances or unique locations for facilities containing permitted sources that could result in significant impacts. For the same reasons, indirect impacts of all project alternatives could also be significant. Therefore, the analysis and comparison of alternatives in this PEA presents a qualitative conclusion as to whether the impacts of each alternative in each topic area would be more or less significant than the proposed project. Table 7-2 summarizes potential indirect impact conclusions for each alternative by environmental topic area.

The analysis of indirect impacts relies on use of offsets from the SCAQMD's internal accounts. This information, however, doesn't indicate how many facilities would be built in the future. For the purposes of this analysis it is assumed that air quality impacts are proportional to the number of facilities constructed and operated in the future. For example, the greater the air quality impacts, the greater the number of facilities constructed and operated in the future, and the greater the potential for indirect impacts.

TABLE 7-2
Comparison of the Indirect Impacts of the Alternatives Compared to the Proposed Project

Environmental Topic	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
I. Aesthetics					
a. Scenic Vista	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
b. Scenic Resources	Significant through 5/1/2012; no impacts thereafter.	Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
c. Visual Character	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
d. Light/Glare	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.

TABLE 7-2 (Continued)
Comparison of the Indirect Impacts of the Alternatives Compared to the Proposed Project

Environmental Topic	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
II. Agricultural and Forestry Resources					
a. Convert prime farmland to non-agricultural uses	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
b. Conflict with Agricultural zoning/ Williamson Act contracts	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
c. Other changes that convert agricultural land to other uses	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
d. Conflict with existing zoning or cause rezoning of forest land	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
e. Other changes that result in the loss of, or convert forest land to other uses	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.

TABLE 7-2 (Continued)
Comparison of the Indirect Impacts of the Alternatives Compared to the Proposed Project

Environmental Topic	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
III. Air Quality – See Chapter 6					
IV. Biological Resources					
a. Habitat modifications that affect sensitive/endangered species	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
b. Adversely affect any riparian/sensitive habitats	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
c. Adversely affect federally protected wetlands	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
d. Interfere with movement of resident or migratory species	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.

TABLE 7-2 (Continued)
Comparison of the Indirect Impacts of the Alternatives Compared to the Proposed Project

Environmental Topic	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
e. Conflict with policy ordinances protecting biological resources	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.
f. Conflict with Habitat Conservation Plans	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.
V. Cultural Resources					
a. Adversely affect historical resources	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.
b. Adversely affect archaeological resources	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.
c. Destroy paleontological/geologic resources	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.

TABLE 7-2 (Continued)
Comparison of the Indirect Impacts of the Alternatives Compared to the Proposed Project

Environmental Topic	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
d. Disturb human remains	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
VI. Energy					
a. Conflict with adopted energy conservation plans	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
b. Create a need for new power or utility systems	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
c. Create significant effect on energy supplies	Significant; inability to modify or replace sources could result in significant adverse impacts.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
d. Comply with existing energy standards	Significant; inability to modify or replace sources could result in significant adverse impacts.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.

TABLE 7-2 (Continued)
Comparison of the Indirect Impacts of the Alternatives Compared to the Proposed Project

Environmental Topic	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
VII. Geology and Soils					
a. Expose people to risks from earthquakes, liquefaction or landslides	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
b. Result in substantial soil erosion	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
c. Locate project on unstable soil	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
d. Locate project on expansive soil	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
e. Incapable to support use of septic tanks/ alternative wastewater disposal systems	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.

TABLE 7-2 (Continued)
Comparison of the Indirect Impacts of the Alternatives Compared to the Proposed Project

Environmental Topic	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
VIII. Hazards and Hazardous Materials					
a. Create hazards through transport, use, or disposal of hazardous materials	Significant ; greater than PR1315.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.
b. Create hazard through upset/accident conditions from release of hazardous materials	Significant ; greater than PR1315.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.
c. Emit hazardous emissions or material within ¼-mile of a nearby school	Significant ; greater than PR1315.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.
d. Located on hazardous material site (pursuant to Gov Code §65962.5)	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.
e. Located within airport land use plan or within two miles of a public airport resulting in hazards to those in area	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.

TABLE 7-2 (Continued)
Comparison of the Indirect Impacts of the Alternatives Compared to the Proposed Project

Environmental Topic	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
f. Located within the vicinity of private airstrip	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
g. Interfere with adopted emergency response plans	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
h. Expose people to risk from wildland fires	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
i. Increase fire hazards from flammable materials	Significant; greater than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
IX. Hydrology and Water Quality					
a. Violate water quality/ discharge standards	Significant; greater than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.

TABLE 7-2 (Continued)
Comparison of the Indirect Impacts of the Alternatives Compared to the Proposed Project

Environmental Topic	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
b. Deplete groundwater supplies/interfere with groundwater recharge	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
c. Alter existing drainage patterns, causing erosion/siltation	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
d. Alter existing drainage patterns, resulting in flooding	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
e. Create runoff exceeding stormwater drainage systems	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
f. Degrade water quality	Significant; greater than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.

TABLE 7-2 (Continued)
Comparison of the Indirect Impacts of the Alternatives Compared to the Proposed Project

Environmental Topic	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
g. Place housing in 100-year flood area	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
h. Impede flows in 100-year flood area	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
i. Expose people to flooding risks	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
j. Inundation by seiche, tsunami, or mudflow	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
k. Exceed wastewater treatment requirements	Significant; greater than PR 1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.

TABLE 7-2 (Continued)
Comparison of the Indirect Impacts of the Alternatives Compared to the Proposed Project

Environmental Topic	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
l. Require new wastewater treatment facilities	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
m. Require new stormwater facilities	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
n. Have sufficient water supplies or are new or expanded entitlements needed	Significant; greater than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.
o. Have adequate wastewater treatment capacity	Significant; greater than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.
X. Land Use and Planning					
a. Physically divide a community	Significant through 5/1/2012; no impacts thereafter.	Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
b. Conflict with land use plans, policies, etc.	Significant through 5/1/2012; no impacts thereafter.	Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.

TABLE 7-2 (Continued)
Comparison of the Indirect Impacts of the Alternatives Compared to the Proposed Project

Environmental Topic	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
c. Conflict with habitat conservation plans	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
XI. Mineral Resources					
a. Loss of availability of known mineral resources	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
b. Loss of availability of locally important mineral resource sites delineated in local general plans	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
XII. Noise					
a. Exceeds local noise standards	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
b. Expose persons to excessive noise/vibration	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.

TABLE 7-2 (Continued)
Comparison of the Indirect Impacts of the Alternatives Compared to the Proposed Project

Environmental Topic	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
c. Permanently increase ambient noise levels	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
d. Temporary/periodic increase in noise levels	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
e. Expose people in areas near public airports to excessive noise	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
f. Expose people in areas near private airstrips to excessive noise	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
XIII. Population and Housing					
a. Induce population growth	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.

TABLE 7-2 (Continued)
Comparison of the Indirect Impacts of the Alternatives Compared to the Proposed Project

Environmental Topic	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
b. Displace/require new housing	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
c. Displace people & require new housing	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
XIV. Public Services					
a. Adverse indirect impacts to fire protection	Significant; greater than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.
b. Adverse indirect impacts to police protection	Significant; greater than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; greater than PR1315.
c. Adverse indirect impacts to schools	Significant; greater than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315..

TABLE 7-2 (Continued)
Comparison of the Indirect Impacts of the Alternatives Compared to the Proposed Project

Environmental Topic	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
d. Adverse indirect impacts to parks	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
e. Adverse indirect impacts to other public facilities	Significant; greater than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.
XV. Recreation					
a. Increase the use of neighborhood parks	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.
b. Require construction of neighborhood parks	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant; greater than PR1315. Cumulative impacts: Significant; greater than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.	Project-specific impacts: Significant; less than PR1315. Cumulative impacts: Significant; less than PR1315.

TABLE 7-2 (Continued)
Comparison of the Indirect Impacts of the Alternatives Compared to the Proposed Project

Environmental Topic	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
XVI. Solid/Hazardous Wastes					
a. Have sufficient landfill capacity to accommodate project	Significant ; greater than PR1315.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.
b. Comply with regulations regarding solid/hazardous wastes	Significant ; greater than PR1315.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.
XVII. Transportation/Traffic					
a. Cause a substantial increase in traffic	Significant ; inability to modify or replace sources could result in significant adverse impacts.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.
b. Individually or cumulatively exceed LOS standards	Significant ; inability to modify or replace sources could result in significant adverse impacts.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.

TABLE 7-2 (CONCLUDED)
Comparison of the Indirect Impacts of the Alternatives Compared to the Proposed Project

Environmental Topic	Alternative A No Project	Alternative B Offset User Fees for Large Businesses	Alternative C Large Businesses Prohibited from Accessing Rule 1304 Exemptions	Alternative D Use of Credits Generated in 2009 and Beyond Only	Alternative E Limited Offset Availability
c. Change air traffic patterns	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.
d. Increase road hazards	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.
e. Result in inadequate emergency access	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.
f. Result in inadequate parking	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.
g. Conflict with alternative transportation policies	Significant through 5/1/2012; no impacts thereafter.	Project-specific impacts: Significant ; greater than PR1315. Cumulative impacts: Significant ; greater than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.	Project-specific impacts: Significant ; less than PR1315. Cumulative impacts: Significant ; less than PR1315.

Aesthetics

Proposed Project

The analysis in Subchapter 5.1 concludes that the proposed project has the potential to generate significant adverse aesthetics impacts. Although CEQA documents for representative facilities identified several mitigation measures that have the potential to reduce future indirect aesthetics impacts resulting from facilities containing stationary sources such mitigation measures are not within the jurisdiction of the SCAQMD to implement. Mitigation of aesthetic impacts would be the responsibility of the public agency (e.g., city or county) that would serve as lead agency on any given future project. Since the SCAQMD cannot predict how a future lead agency might choose to mitigate a particular significant aesthetic impact, the potential exists for future indirect aesthetic impacts to be significant and unavoidable (i.e., significant even after mitigation).

Scenic Vista

The analysis of potentially significant adverse scenic vista impacts from the proposed project was based on the review of 52 CEQA documents prepared for past projects that represent projects in all nine primary categories for facilities that may be eligible to receive permits under Rules 1304 and 1309.1. The survey of the 52 CEQA documents shown in Table 5.1-1 revealed that the following primary facility categories would significantly adversely affect scenic vistas: retail/services facilities (document #5); large commercial facilities (document #13); entertainment/recreational facilities (documents #21 and #22); and utility facilities (documents #44 and #45). The CEQA documents for the remaining primary facility categories: agricultural facilities; institutional facilities; transportation facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse scenic vista impacts. Based on the results of the CEQA document survey and the possibility that future individual projects in all of these facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts on scenic vistas, it was concluded that the proposed project would create significant adverse indirect impacts on scenic vistas.

Scenic Resources

The survey of the 52 CEQA documents shown in Table 5.1-1 revealed that only one primary facility category, entertainment/recreational facilities (#22), would significantly adversely affect scenic resources. The CEQA documents for the remaining primary facility categories: agricultural facilities; retail/services facilities; large commercial facilities; institutional facilities; transportation facilities; utility facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse scenic resources impacts. Based on the results of the CEQA document survey

and the possibility that future individual projects in all of these facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts on scenic resources, it was concluded that the proposed project would create significant adverse indirect impacts on scenic resources.

Visual Character

The survey of the 52 CEQA documents shown in Table 5.1-1 revealed that the following primary facility categories would significantly adversely affect local visual character: large commercial facilities (documents #16 and #17); entertainment/recreational facilities (#21 and #22); institutional facilities (documents #28 and #34); transportation facilities (document #40); and utility facilities (documents #44 and #45). The CEQA documents for the remaining primary facility categories: agricultural facilities; retail/services facilities; institutional facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse visual character impacts. Based on the results of the CEQA document survey and the possibility that future individual projects in all of these facility categories could be sited in or near a location that could create significant adverse indirect impacts on visual character, it was concluded that the proposed project would create significant adverse indirect impacts on visual character.

Light/Glare

The survey of the 52 CEQA documents shown in Table 5.1-1 revealed that the following primary facility categories would create significant adverse light and glare impacts: retail/services facilities (documents #5, #6, and #8); large commercial facilities (documents #16, #17, and #19); and entertainment/recreational facilities (#21 and #22). Light and glare impacts were generally related to lighting parking lots, live performance venues, etc. The CEQA documents for the remaining primary facility categories: agricultural facilities; institutional facilities; transportation facilities; utility facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse light or glare impacts. Based on the results of the CEQA document survey and the possibility that future individual projects in all of these facility categories could be sited in or near a location that could create significant adverse light and glare impacts, it was concluded that the proposed project would create significant adverse indirect light and glare impacts.

Cumulative Impacts

Project impacts to visual resources could combine with impacts from other past, present and future projects, including projects permitted under SB 827, projects permitted in reliance on ERC's and new power plants entitled to receive offsets pursuant to state law.

It was concluded that the proposed project would make a cumulatively considerable contribution to significant impacts to visual resources.

Alternative A - No Project Alternative

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted, but that SB 827 will be in effect, which will allow the issuance of offsets from January 1, 2010 through May 1, 2012. In addition, it is reasonably foreseeable that three new power plants could be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under the No Project Alternative, it is assumed that facilities that previously relied on access to the SCAQMD's internal accounts in the past to demonstrate equivalency with federal offset requirements, through either Rule 1304 or Rule 1309.1, would no longer have access to those offsets when applying for a permit for new or modified equipment. Although these facilities could potentially obtain credits on the open market, these offsets, if available, would likely be unaffordable to most facilities. As a result, the analysis in this PEA assumes that no facilities that would have obtained offsets pursuant to Rules 1304 or 1309.1 would be built after May 1, 2012.

Since it is assumed that, starting May 1, 2012, future facilities that would have obtained offsets from the SCAQMD's internal accounts would not be constructed and operated under the No Project Alternative, impacts to aesthetics resources, in general, would not be expected to occur after May 1, 2012, and would be less than the significance determination for the proposed project.

Scenic Vista

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted, but that SB 827 will be in effect, which will allow the issuance of offsets from January 1, 2010 through May 1, 2012. In addition, it is reasonably foreseeable that three new power plants could be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, scenic vista impacts are considered to be significant. Starting May 1, 2012, projects that previously

would have had access to the SCAQMD's internal accounts would no longer have access to these sources of offsets. Therefore, after May 1, 2012 potential adverse indirect impacts to scenic vistas in the district would be relatively small compared to the proposed project, so under the No Project Alternative scenic vista impacts would not be expected to occur after May 1, 2012, and would be less than the significance determination for the proposed project.

Scenic Resources

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted, but that SB 827 will be in effect, which will allow the issuance of offsets from January 1, 2010 through May 1, 2012. In addition, it is reasonably foreseeable that three new power plants could be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, scenic resources impacts are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts would no longer have access to these sources of offsets. Therefore, after May 1, 2012, there would be little or no change to scenic resources as a result of implementing Alternative A, so significant scenic vista impacts would not be expected to occur after May 1, 2012, and would be less than the significance determination for the proposed project.

Visual Character

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted, but that SB 827 will be in effect, which will allow the issuance of offsets from January 1, 2010 through May 1, 2012. In addition, it is reasonably foreseeable that three new power plants could be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, visual character impacts are considered to be significant. Starting May 1, 2012, future facilities that

would have had access to the SCAQMD's internal accounts would no longer have access to these sources of offsets. Therefore, after May 1, 2012, there would be few, if any, changes to visual character as a result of implementing Alternative A, so visibility impacts under the No Project Alternative would not be expected to occur after May 1, 2012, and would be less than the significance determination for the proposed project.

Light/Glare

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted, but that SB 827 will be in effect, which will allow the issuance of offsets from January 1, 2010 through May 1, 2012. In addition, it is reasonably foreseeable that three new power plants could be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, light/glare impacts are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts would no longer have access to these sources of offsets. Therefore, after May 1, 2012 no new facilities that rely on offsets from the SCAQMD's internal offset and that could produce light and/or glare impacts are assumed to be constructed and operated. Consequently, light and glare conditions in the district would not change compared to the proposed project, so light and glare impacts would not be expected to occur after May 1, 2012, would not be significant, and would be less than the significance determination for the proposed project.

Alternative B – Offset User Fees for Large Businesses

Alternative B would impose user fees on large businesses that qualify for an exemption from federal offset requirements under Rule 1304 exemption. User fees would be used to fund emission reduction projects, with preference given to locating the emission reduction projects in the vicinity of the new or modified facility.

Typical types of emission reduction projects that could be funded by the offset user fees under Alternative B are identified in Table 7-3. Although emission reduction projects funded by the offset user fees are intended to produce air quality benefits, it is recognized that they could generate potentially significant adverse secondary environmental impacts.

TABLE 7-3
Alternative B – Impacts from Potential Emission Reduction Projects

Key to Impacts Identified in CEQA Document(s): S = Significant; LS = Less than Significant; LSM = Less-than-Significant with Mitigation; NE = Not Evaluated; N = No impacts; B = Beneficial

Emission Reduction Projects	Aesthetics	Agricultural/Forestry Resources	Air Quality - Construction	Air Quality - Operation	Air Quality - GHGs	Biological Resources	Cultural Resources	Energy	Geology and Soils	Hazards and Hazardous Materials	Hydrology and Water Quality	Land Use and Planning	Mineral Resources	Noise	Population and Housing	Public Services	Recreation	Solid/Hazardous Waste	Transportation/Traffic
Promotion of solar collectors as renewable energy ¹	LSM	N	LSM	LSM	NE	LSM	LSM	B	LSM	LSM	LSM	LSM	N	LSM	N	N	N	LSM	LSM
Promotion wind turbines as renewable energy ²	N	LSM	LS	LS	NE	LSM	LSM	B	LSM	LSM	LSM	N	LS	N	LS	N	N	LS	N
Promotion geothermal energy generation as renewable energy ³	LSM	LSM	LSM	S	NE	LSM	LSM	B	LSM	LSM	LSM	LSM	LS	LSM	N	N	N	LSM	LSM
Promotion biosolids energy production as renewable energy ⁴	LSM	N	LSM	LS	B	LSM	LSM	LS	LSM	LS	LS	LS	N	LS	N	LS	LS	LS	LSM
Promote biogas generators as renewable energy ⁵	N	N	S	S	S	N	N	LS	N	N	LS	N	N	S	N	N	N	N	N
Construct anaerobic digesters ⁶	NE	S	NE	S	NE	LS	S	S	S	S	NE	S	N	S	NE	S	NE	NE	LS
Development of better energy storage capacity ⁷	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Capturing energy losses during transmissions ⁸	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Retrofit diesel powered school buses with particulate traps or oxidation catalysts ⁹	NE	NE	NE	B	NE	NE	NE	NE	NE	LS	NE	NE	NE	NE	NE	NE	NE	LS	NE

TABLE 7-3 (Continued)
Alternative B – Impacts from Potential Emission Reduction Projects

Key to Impacts Identified in CEQA Document(s): S = Significant; LS = Less than Significant; LSM = Less-than-Significant with Mitigation; NE = Not Evaluated; N = No impacts; B = Beneficial

Emission Reduction Projects	Aesthetics	Agricultural/Forestry/Resources	Air Quality - Construction	Air Quality - Operation	Air Quality - GHGs	Biological Resources	Cultural Resources	Energy	Geology and Soils	Hazards & Hazardous Materials	Hydrology and Water Quality	Land Use and Planning	Mineral Resources	Noise	Population and Housing	Public Services	Recreation	Solid/ Hazardous Waste	Transportation/ Traffic
Replace existing diesel school buses with new alternative-fueled school buses ¹⁰	N	NE	S	S	NE	N	N	LS	N	LS	LS	N	LS	N	N	LS	N	LS	LS
Repower off-road heavy-duty diesel equipment with lower-emission diesel engines and particulate traps ^{11a} and ^{11b}	N	N	N	B ^{11b}	LS	N	N	LS	N	N	N	N	N	N	N	N	N	LS	
Replace portable diesel generators with micro turbines ¹²	N	N	LS	B	B	N	N	LS	N	S	N	N	N	N	N	N	N	LS	N
Provide low-sulfur diesel fuel to local passenger locomotives ¹³	B	NE	N	B	LS	NE	NE	N	NE	NE	N	NE	NE	NE	NE	NE	NE	NE	NE
Expand liquefied natural gas (LNG) refueling infrastructure ¹⁴	LS	NE	S	S	NE	LSM	N	N	LSM	LSM	LSM	LS	LSM	LSM	LS	LS	LS	N	LSM
Install fuel cells (e.g., phosphoric acid fuel cell, molten carbonate fuel cell) in any mobile or stationary application ¹⁵	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

TABLE 7-3 (Concluded)
Alternative B – Impacts from Potential Emission Reduction Projects

Key to Impacts Identified in CEQA Document(s): S = Significant; LS = Less than Significant; LSM = Less-than-Significant with Mitigation; NE = Not Evaluated; N = No impacts; B = Beneficial

Emission Reduction Projects	Aesthetics	Agricultural/Forestry Resources	Air Quality - Construction	Air Quality - Operation	Air Quality - GHGs	Biological Resources	Cultural Resources	Energy	Geology and Soils	Hazards & Hazardous Materials	Hydrology and Water Quality	Land Use and Planning	Mineral Resources	Noise	Population and Housing	Public Services	Recreation	Solid/ Hazardous Waste	Transportation/ Traffic
Purchase of fuel cells and electrification usage with ships at the dock ¹⁶	N	N	S	B ¹⁶ AMP	S	S	LS	LS	S	S	S	N	LS	S	LS	LS	S	LSM	LS
Retrofit other diesel mobile sources with particulate traps or oxidation catalysts ¹⁷	N	N	N	B	B	N	N	N	N	LS ⁹	N	N	N	N	N	N	N	LS ⁹	N
Conversion of other diesel engines to Alternative Fuels ¹⁸	S	N	LS	B	B	N	N	LS	N	S	N	N	N	N	N	N	N	LS	N
Conversion of lawn and garden equipment to battery and electric ¹⁹	N	N	LS	B	B	N	N	B	N	LS	N	N	N	B	N	N	N	LS	LS

1. California Energy Commission. 2008. Final Staff Assessment Victorville 2 Hybrid Power Project Application for Certification (02-AFC-1) San Bernardino County. <http://www.energy.ca.gov/2007publications/CEC-700-2007-021/CEC-700-2007-021-FSA.PDF>. (250-acre solar thermal project generating 50 MW of electricity, part of a larger electricity generating project). (Note: LSM determination for operational air quality is based on mitigation for the non-solar portion of the project.)
2. City of Palm Springs and Bureau of Land Management. 2007. Mountain View IV Wind Energy Project EIS/EIR. http://www.blm.gov/ca/st/en/fo/palmsprings/mtnview_windenergy.html. (The proposed 49 MW wind generation project consists of either 58 Gamesa Eolica G52 (850 kW) or 49 Mitsubishi Heavy Industries (MHI) 1000A (1,000 kW) wind turbine generators (WTG), padmounted electric transformers, ancillary facilities, gravel roads, underground and overhead interconnection lines, and an electrical substation.)
3. California Energy Commission. 2003. Final Staff Assessment Salton Sea Geothermal Unit #6 Power Project For Certification (07-AFC-2) Imperial County. http://www.energy.ca.gov/sitingcases/saltonsea/documents/2003-08-05_FSA_1.PDF. (80-acre geothermal steam power plant, associated water supply, production and reinjection wells and pads, brine pipelines, two 161 kV transmission lines). (Note: PM2.5 emissions were not evaluated.)

4. City of Banning. 2008 Draft EIR for City of Banning's Liberty XXIII Renewable Energy Power Plant Project, Liberty Energy Centre" (June 2008) prepared by Aspen Environmental. *(Liberty Energy is proposing to construct a new biomass power plant, which would include three power generation units (trains) to produce 15 MW (17.5 MW gross). The units would be fueled with a mixture of biosolids and biomass.)*
5. South Coast Air Quality Management District. 2009. Notice of Preparation and Initial Study (NOP/IS) for the Sunshine Gas Producers' Renewable Energy Project. <http://www.aqmd.gov/ceqa/nonaqmd.html>. (The proposed project consists of installing five gas turbines and ancillary equipment to generate renewable electricity using landfill gas that is currently being flared. Because the Draft Subsequent Environmental Impact Report has not yet been completed, circulated for public review, or finalized, results here are considered to be preliminary.)
6. Inland Empire Utilities Agency. 2001. Proposed Negative Declaration by the Inland Empire Utilities Agency for the On-site Dairy Digester/Chino 1 Desalter Power Generation Pilot Scale Project. *(IAUA has developed an organics management strategy for the Chino Basin and the Santa Ana River Basin and includes, for example, installing anaerobic digestion technology that would operate using biogas from dairy manure to produce 1.75 MW of electricity, 30 tons per day of organic fertilizer, and prevent 12 tons per day of salts/nitrates from entering the groundwater. In total, all projects that are part of the organics management strategy have the potential to generate up to 50MW of electricity.)*
7. No CEQA documents identified.
8. No CEQA documents identified.
9. California Air Resources Board. 2005. Initial Statement of Reasons Proposed Clean On-road School Bus Regulation for School Buses Operating in the South Coast Air Quality Management District. <http://www.arb.ca.gov/regact/scschl05/isor.pdf>. (If funding is not available to purchase alternative fuel school buses that meet the emission limits prescribed in the regulation, then the school bus fleet operator may purchase a new bus not meeting the best requirements providing the bus purchased is equipped with a California-certified engine meeting a PM standard of 0.01 g/bhp-hr through use of a particulate filter.)
10. South Coast Air Quality Management District. 2000. Final Program Environmental Assessment for: Proposed Fleet Vehicle Rules and Related Rule Amendments. <http://www.aqmd.gov/ceqa/documents/2000/aqmd/finalEA/1190/1190FEA.html>. *(Significance conclusions reflect impacts from converting fleet vehicles to alternative clean fuels and impacts from refinery modifications to produce low sulfur diesel.)*
11. ^a South Coast Air Quality Management District. 2008. Final Environmental Assessment for: Proposed Rule 2449 – Control of Oxides of Nitrogen Emissions from Off-Road Diesel Vehicles. <http://www.aqmd.gov/ceqa/documents/2008/aqmd/finalEA/FEA2449.pdf>. *(PR 2449 would require owners of affected off-road fleets to apply for incentive funds by a deadline established by SCAQMD's program announcement. Affected fleets which are in-use off-road diesel vehicle fleets with over 20,000 hp and over 40 percent of their statewide fleet consisting of Tier 0 and Tier 1 engine ratings as of January 1, 2008.)*
^b California Air Resources Board. 2007. Technical Support Document: Proposed Regulation for In-use Off-road Diesel Vehicles. Note: CARB identified a slight increase in NOx emissions from some control technologies, but, overall, the regulation reduces NOx emissions from affected vehicles.
12. South Coast Air Quality Management District. 2008. Final Environmental Assessment: Proposed Amended Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines (ICEs). <http://www.aqmd.gov/ceqa/documents/2008/aqmd/finalEA/1110.2/FinalEA.pdf>. *(PAR 1110.2 Would reduce NOx, VOC and CO emissions from gaseous and liquid-fueled ICEs, which may include replacing diesel ICEs with microturbines. Several other replacement technologies were analyzed, but results in the table are only for microturbines.)*

13. California Air Resources Board. 2004. Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Regulatory Amendments Extending the California Standards for Motor Vehicle Diesel Fuel to Diesel Fuel Used in Harborcraft and Intrastate Locomotives. <http://www.arb.ca.gov/regact/carblohc/isor.pdf>. (CARB staff required that, beginning January 1, 2007, diesel fuel sold, supplied, or offered for sale to California intrastate locomotive operators statewide be required to meet the specifications for vehicular diesel fuel. CARB is investigating means to encourage the early introduction of Tier II locomotives in the rest of the state.)
14. Federal Energy Regulatory Commission and Port of Long Beach. 2004. Draft EIS/EIR for the SES Long Beach LNG Import Project” (October 2005) prepared by Port of Long Beach and Federal Energy Regulatory Commission. (The proposed project consists of constructing and operating a liquefied natural gas (LNG) receiving terminal and associated facilities in the Port of Long Beach as a place of entry for the importation of LNG.)
15. No CEQA documents identified.
16. Port of Los Angeles. 2008. Draft Subsequent Environmental Impact Statement/Supplemental Environmental Impact Report for the Pacific L.A. Marine Terminal LLC Crude Oil Terminal . http://www.portoflosangeles.org/EIR/PacificLAMarine/SEIR/seir_pacificLA_marine.asp. (The proposed Project would include construction and operation of a new marine terminal 15 at Berth 408 on Pier 400 (Marine Terminal), new tank farm facilities. In addition, the proposed project includes an alternative maritime power (AMP) System, which focuses on reducing emissions from vessels docked at the Port by allowing vessels to “plug in” and utilize electricity generated by onshore sources (not fuel cells) rather than using onboard diesel-fueled generators. This practice is termed alternative marine power (AMP). The Port would build the infrastructure (i.e., pile supported platform) necessary to support AMP as an element of the proposed Project. AMP means impact conclusion is for the AMP portion of the project. Otherwise, impact determinations are for the entire project, not just the AMP project.)
17. California Air Resources Board. 2008. Staff Report: Initial Statement of Reasons for Proposed Regulation for In-use On-road Diesel Vehicles. <http://www.arb.ca.gov/regact/2008/truckbus08/tbisor.pdf>. (This regulation would achieve NOx and PM emission reductions by requiring fleet owners to modernize their fleets and install exhaust retrofits.)
18. South Coast Air Quality Management District. 2008. Final Environmental Assessment: Proposed Amended Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines (ICEs). <http://www.aqmd.gov/ceqa/documents/2008/aqmd/finalEA/1110.2/FinalEA.pdf>. (PAR 1110.2 Would reduce NOx, VOC and CO emissions from gaseous and liquid-fueled ICEs, which may include replacing diesel ICEs with alternative fuel engines, primarily liquefied natural gas (LNG). Several other replacement technologies were analyzed, but results in the table are only for alternative fuel engines.)
19. South Coast Air Quality Management District. 2009. Final Program Environmental Assessment for: Proposed Rule 2702 – Greenhouse Gas Reduction Program. http://www.aqmd.gov/ceqa/documents/2009/aqmd/finalEA/FPEA_2702.pdf. (PR2702 establishes a greenhouse gas (GHG) reduction program where participants can pay fees to the SCAQMD and the SCAQMD will use the fees for GHG reduction projects using adopted protocols, including leaf blower and lawn mower exchanges to replace gasoline powered lawn mowers with electric lawn mowers and high polluting two-stroke leaf blowers with low polluting four-stroke leaf blowers. Impacts are based on impacts from the lawn mower and leaf blower exchanges only.)

To address secondary adverse environmental impacts that could be generated by future emission reduction projects, SCAQMD staff surveyed 16 CEQA documents for projects that are comparable to the emission reduction projects that could be funded by the user offset fees. The results of the survey, summarized in Table 7-3, have been used to identify potentially significant adverse indirect impacts from Alternative B.

Scenic Vista

The analysis of potential indirect scenic vista impacts as a result of implementing Alternative B is based on comparing the relative merits of this alternative with the proposed project. The survey of CEQA documents to evaluate the potential for scenic vista impacts from the proposed project identified the following primary facility categories that would significantly adversely affect scenic vistas: retail/services facilities, large commercial facilities, entertainment/recreational and utility facilities. Due to their potential to be located in areas affecting scenic vistas, all primary facility categories were deemed to result in significant impacts to scenic vistas. Because the same types and numbers of facilities could be built under Alternative B, Alternative B would generate similar or fewer scenic vista impacts compared to the proposed project.

The main difference between Alternative B and the proposed project is Alternative B also would result in indirect effects of potential future emission reduction projects on scenic vistas. For example, a number of emission reduction projects could be located in or near scenic vistas, resulting in their degradation of scenic vistas. Such projects include, but are not limited to: wind turbines, solar collector panels, and construction of anaerobic digesters.

For the above reasons it is concluded that Alternative B would create significant adverse indirect impacts on scenic vistas equivalent to or greater than the proposed project. The contribution to cumulative scenic impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Scenic Resources

The survey of CEQA documents to evaluate the potential for scenic vista impacts from the proposed project identified one primary facility category, entertainment/recreational facilities, which would significantly adversely affect scenic resources. Due to their potential to be located in areas affecting scenic resources, all primary facility categories were deemed to result in significant impacts to scenic resources. Because the same types and numbers of facilities could be built under Alternative B, Alternative B would generate similar scenic resources impacts compared to the proposed project.

The main difference between Alternative B and the proposed project is Alternative B also would result in indirect effects of potential future emission reduction projects on scenic resources. For example, a number of emission reduction projects could be located in or near scenic resources, resulting in degradation of these scenic resources. Such projects include, but are not limited to: wind turbines, solar collector panels, and construction of anaerobic digesters.

For the above reasons, it is concluded that the Alternative B would create significant adverse indirect impacts on scenic resources equivalent to or greater than the proposed project. The contribution to cumulative scenic resources impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Visual Character

The analysis of potential indirect visual character impacts as a result of implementing Alternative B is based on comparing the relative merits of this alternative with the proposed project. The survey of CEQA documents to evaluate the potential for visual character impacts from the proposed project identified the following primary facility categories that would significantly adversely affect visual character: large commercial facilities, entertainment/recreational facilities, institutional facilities, transportation facilities, and utility facilities. Due to their potential to be located in areas affecting visual character, all primary facility categories were deemed to result in significant impacts to visual character. Because the same types and members of facilities could be built under Alternative B, Alternative B would generate similar visual character impacts compared to the proposed project.

The main difference between Alternative B and the proposed project is Alternative B also would result in indirect effects of potential future emission reduction projects on visual character. For example, a number of emission reduction projects could be located in or near areas with unique or important visual character, resulting in degradation of visual character in affected areas. Such projects include, but are not limited to: wind turbines, solar collector panels, and construction of anaerobic digesters. However, these same types of projects would also be expected to reduce pollution, thus providing beneficial effects to air quality and the associated visual character in the district.

For the above reasons, it is concluded that the Alternative B would create indirect impacts on visual character resources equivalent to or greater than the proposed project. The contribution to cumulative visual character impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Light/Glare

The analysis of potential indirect light and glare impacts as a result of implementing Alternative B is based on comparing the relative merits of this alternative with the proposed project. The survey of CEQA documents to evaluate the potential for light and glare impacts from the proposed project identified the following primary facility categories that would cause significant adverse light and glare impacts: retail/services facilities, larger commercial facilities, and entertainment/recreational facilities. Due to their potential to be located in areas affecting light and glare, all primary facility categories were deemed to result in significant impacts to light and glare. Because the same types and members of facilities could be built under Alternative A, Alternative B would generate similar light and glare impacts compared to the proposed project.

The main difference between Alternative B and the proposed project is Alternative B also would result in effects of light and glare from potential future emission reduction projects. For example, a number of emission reduction projects could create significant adverse light and glare impacts. Such projects include, but are not limited to: construction of anaerobic digesters, and construction of alternative fuel fueling stations.

For the above reasons, it is concluded that the Alternative B would create significant adverse indirect light and glare impacts equivalent to or greater than the proposed project. The contribution to cumulative light or glare impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Alternative C- Large Businesses Prohibited from Accessing Rule 1304 Exemptions

Alternative C is similar in most respects to the proposed project except that large businesses would be prohibited from qualifying for an exemption from offset requirements through Rule 1304. Since Alternative C would prohibit large businesses from qualifying for exemptions pursuant to Rule 1304, they would likely have to obtain credits on the open market. To provide a conservative analysis relative to impacts compared to the proposed project, it is assumed that there will not be an increase in the use of credits from Alternative C on the open market.

Offsets debited from the SCAQMD's internal accounts for large businesses represent a small percentage of the total number of offsets debited from the SCAQMD's internal accounts for all sources. As a result, it is expected that Alternative C would result in slightly fewer facilities receiving permits in reliance on the SCAQMD's offset accounts.

Scenic Vista

The analysis of potential indirect scenic vista impacts as a result of implementing Alternative C is based on comparing the relative merits of this alternative with the proposed project. The survey of CEQA documents to evaluate the potential for scenic vista impacts from the proposed project identified the following primary facility categories that would significantly adversely affect scenic vistas: retail/services facilities, large commercial facilities, entertainment/recreational and utility facilities. Due to their potential to be located in areas affecting scenic vistas, all primary facility categories were deemed to result in significant impacts to scenic vistas. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer scenic vista impacts compared to the proposed project.

Based upon the above information, there would be fewer or less significant potential scenic vista impacts from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. Adverse scenic vista impacts are still expected to be significant because one project could potentially generate significant adverse scenic vista impacts. The contribution to cumulative indirect impacts to scenic resources from Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Scenic Resources

The survey of CEQA documents to evaluate the potential for scenic vista impacts from the proposed project identified one primary facility category, entertainment/recreational facilities, which would significantly adversely affect scenic resources. Due to their potential to be located in areas affecting scenic resources, all primary facility categories were deemed to result in significant impacts to scenic resources. It is expected that the same type and number of primary facility categories under Alternative C would generate similar or fewer scenic resources impacts compared to the proposed project.

Based upon the above information, there would be fewer or less significant potential scenic resources impacts from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. Adverse scenic resources impacts are still expected to be significant because any one project could potentially generate significant adverse scenic impacts. The contribution to cumulative indirect impacts to scenic resources from Alternative C would be significant, but less than the proposed project because fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Visual Character

The survey of CEQA documents to evaluate the potential for visual character impacts from the proposed project identified the following primary facility categories that would significantly adversely affect visual character: large commercial facilities, entertainment/recreational facilities, institutional facilities, transportation facilities, and utility facilities. Due to their potential to be located in areas affecting visual character, all primary facility categories were deemed to result in significant impacts to visual character. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer visual character impacts compared to the proposed project.

Based on the above information, there would be fewer or less significant visual character impacts from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts to visual character in the district from Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Light/Glare

The survey of CEQA documents to evaluate the potential for light and glare impacts from the proposed project identified the following primary facility categories that would cause significant adverse light and glare impacts: retail/services facilities, larger commercial facilities, and entertainment/recreational facilities. Due to their potential to be located in areas affecting light and glare, all primary facility categories were deemed to result in significant impacts to light and glare. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer light and glare impacts compared to the proposed project.

Based upon the above information, there would be fewer or less significant potential light and glare impacts from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. Adverse light or glare impacts are still expected to be significant because any one project could potentially generate significant adverse light or glare impacts. The contribution to cumulative indirect light and glare impacts from Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Alternative D - Use of Credits Generated in 2009 and Beyond Only

The primary effect of implementing Alternative D is that a fewer number of new credits would be available each year after adoption of this alternative compared to the proposed project. The reason fewer offsets would be available is as follows. Under Alternative D, all offsets in the SCAQMD's existing offset accounts would be eliminated. As a result, offsets from these accounts could not be used to demonstrate equivalency with federal offset requirements in the future. Only new credits generated in 2009 and succeeding years can be used as debits to for demonstrating equivalency with federal offset requirements. Because SCAQMD's previous offset accounts would be eliminated under Alternative D, debits could not exceed the number of new credits generated each year, thus, effectively capping the number of debits that can be issued per year to an amount less than the proposed project.

The analysis of indirect environmental impacts from Alternative D assumes that regional emissions are proportional to the number of projects constructed and operated in the future as a result of implementing this alternative. This means that if direct regional emissions from Alternative D are less than the direct regional emissions from the proposed project, fewer facilities would be built in the future, resulting in fewer or less significant adverse indirect impacts.

Scenic Vista

The analysis of potential indirect scenic vista impacts as a result of implementing Alternative D is based on comparing the relative merits of this alternative with the proposed project. The survey of CEQA documents to evaluate the potential for scenic vista impacts from the proposed project identified the following primary facility categories that would significantly adversely affect scenic vistas: retail/services facilities, large commercial facilities, entertainment/recreational and utility facilities. For this reason and the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts on scenic vistas, it was concluded that the proposed project would create significant adverse indirect impacts on scenic vistas. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer scenic vista impacts compared to the proposed project.

Based upon the above information, indirect scenic vista impacts as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be

available from the SCAQMD's internal offset accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse cumulative scenic vista impacts, but cumulative scenic vista impacts would be less than the proposed project.

Scenic Resources

The survey of CEQA documents to evaluate the potential for scenic vista impacts from the proposed project identified one primary facility category, entertainment/recreational facilities, which would significantly adversely affect scenic resources. For this reason and the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts on scenic resources, it was concluded that the proposed project would create significant adverse indirect impacts on scenic resources. Because fewer facilities could be built under Alternative D, Alternative D would generate similar or fewer scenic resources impacts compared to the proposed project.

Based upon the above information, indirect scenic resource impacts as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal offset accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse cumulative scenic resources impacts, but cumulative scenic resources impacts would be less than the proposed project.

Visual Character

The survey of CEQA documents to evaluate the potential for visual character impacts from the proposed project identified the following primary facility categories that would significantly adversely affect visual character: large commercial facilities, entertainment/recreational facilities, institutional facilities, transportation facilities, and utility facilities. For this reason and the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be

sited in or near a location that could create significant adverse visual character impacts, it was concluded that the proposed project would create significant adverse indirect impacts on visual character. Based on the analysis of air quality impacts in Chapter 6, Alternative D would generate similar visual character impacts compared to the proposed project.

Based upon the above information, indirect visual character impacts as a result of implementing Alternative D are considered to be significant and approximately equivalent to the proposed project, resulting in similar overall impacts on an annual basis. Similarly, the contribution to cumulative impacts from Alternative D is expected to be significant and similar to the proposed project. Although pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated and only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements, air quality impacts from Alternative D would be approximately equivalent to the proposed project. Therefore, it is likely that similar number of facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1 compared to this proposed project. As a result, significant adverse cumulative visual character impacts would be significant and approximately equivalent to cumulative visual character impacts from the proposed project.

Light/Glare

The survey of CEQA documents to evaluate the potential for light and glare impacts from the proposed project identified the following primary facility categories that would cause significant adverse light and glare impacts: retail/services facilities, larger commercial facilities, and entertainment/recreational facilities. For this reason and the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse light and glare impacts, it was concluded that the proposed project would create significant adverse indirect light and glare impacts in the district. Because fewer facilities could be built under Alternative D, Alternative D would generate similar or fewer light and glare impacts compared to the proposed project.

Based upon the above information, indirect light and glare impacts as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal offset accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor

sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse cumulative light or glare impacts, but cumulative light or glare impacts would be less than the proposed project.

Alternative E – Limited Offset Availability

Alternative E is similar to PR 1315 in most respects. Like the proposed project, offsets provided by Alternative would be generated by two sources. First, under Alternative E, growth in stationary source emissions for the industry categories that are potentially eligible for permits issued under Rules 1309.1 and Rule 1304 would be 50 percent of the growth in stationary source emissions from those sources anticipated by the AQMP. The second component includes the emissions from existing sources that relied on offsets from the SCAQMD internal accounts for permits issued prior to July 2010 and that would shut down during the twenty-year analysis timeframe. This second component, i.e., shutdown emissions from stationary sources returned to the SCAQMD, would be the same under the proposed project and under Alternative E.

The analysis of indirect environmental impacts from Alternative E assumes that regional emissions are proportional to the number of projects constructed and operated in the future as a result of implementing this alternative. This means that if direct regional emissions from Alternative E are less than the direct regional emissions from the proposed project, fewer facilities would be built in the future, resulting in fewer or less significant adverse indirect impacts. According to Tables 6-100 and 6-101 in Chapter 6, air quality impacts from Alternative E are less than air quality impacts from the proposed project for most milestone years. Therefore, it is assumed that indirect impacts in general from Alternative E are less than indirect impacts from the proposed project.

Scenic Vista

The analysis of potential indirect scenic vista impacts as a result of implementing Alternative E is based on comparing the relative merits of this alternative with the proposed project. The survey of CEQA documents to evaluate the potential for scenic vista impacts from the proposed project identified the following primary facility categories that would significantly adversely affect visibility: large commercial facilities, entertainment/recreational facilities, institutional facilities, transportation facilities, and utility facilities. For this reason and the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts on visibility, it was concluded that the proposed project would create significant adverse indirect visibility impacts. Because fewer facilities could be built under Alternative E,

Alternative E would generate similar or fewer impacts to scenic vistas compared to the proposed project.

Indirect scenic vista impacts from implementing Alternative E would be less than indirect scenic vista impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect scenic vista impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative scenic vista impacts from implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Scenic Resources

The survey of CEQA documents to evaluate the potential for scenic vista impacts from the proposed project identified one primary facility category, entertainment/recreational facilities, which would significantly adversely affect scenic resources. For this reason and the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts on scenic resources, it was concluded that the proposed project would create significant adverse indirect impacts on scenic resources. Because fewer facilities could be built under Alternative E, Alternative E would generate similar or fewer scenic resources impacts compared to the proposed project.

Indirect scenic resources impacts from implementing Alternative E would be less than indirect scenic resources impacts from the proposed project because fewer representative facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If debit demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect scenic resources impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative scenic resources impacts from implementing Alternative E would be significant, but less than

the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Visual Character

The survey of CEQA documents to evaluate the potential for visual character impacts from the proposed project identified the following primary facility categories that would significantly adversely affect visual character: large commercial facilities, entertainment/recreational facilities, institutional facilities, transportation facilities, and utility facilities. For this reason and the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse visual character impacts, it was concluded that the proposed project would create significant adverse indirect impacts on visual character in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar or fewer visual character impacts compared to the proposed project.

Indirect visual character impacts from implementing Alternative E would be less than indirect visual character impacts from the proposed project because fewer representative facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If debit demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect visual character impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative visual character impacts from implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Light/Glare

The survey of CEQA documents to evaluate the potential for light and glare impacts from the proposed project identified the following primary facility categories that would cause significant adverse light and glare impacts: retail/services facilities, larger commercial facilities, and entertainment/recreational facilities. For this reason and the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse light and glare impacts, it was concluded that the proposed project would create significant adverse indirect light and glare impacts in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar or fewer light and glare impacts.

Indirect light and glare impacts from implementing Alternative E would be less than indirect light and glare impacts from the proposed project because fewer representative facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If debit demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect light and glare impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative light and glare impacts from implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Agricultural and Forestry Resources

Proposed Project

In the NOP/IS for the proposed project, it was concluded that the proposed project would not generate significant adverse agricultural impacts. The rationale for this conclusion was as follows. If it is assumed that implementing PR 1315 is the necessary first step in siting future commercial or industrial projects, as claimed by environmental groups, then it is possible that industrial or commercial facilities could be sited at locations that would convert agricultural land to non-agricultural uses. In the NOP/IS SCAQMD staff rejected this rationale stating that it would be unlikely that commercial or industrial projects would be sited in areas zoned for agricultural purposes. As discussed in the following subsections, SCAQMD staff has taken a more conservative approach in this PEA and concluded that the proposed project could be considered a necessary first step in siting future land use projects and there may be situations where agriculturally zoned areas are rezoned specifically to allow other types of land uses, including commercial or industrial projects, which could result in converting agricultural land to non-agricultural uses. The analysis in Subchapter 5.02 concludes that the proposed project has the potential for significant impacts on agricultural and forestry resources.

Although the survey of CEQA documents for representative facilities identified several mitigation measures that have the potential to reduce future indirect impacts to agricultural resources resulting from the proposed project, no mitigation measures were identified that are within the jurisdiction of the SCAQMD to implement. Mitigation of indirect impacts to agricultural resources would be the responsibility of the public agency (e.g., city or county), which would normally be the lead agency.

Convert Prime Farmland to Non-agricultural Uses

The survey of the 52 CEQA documents shown in Table 5.2-1 revealed that the heavy industrial facility category could create significant adverse as a result of converting prime farmland to non-agricultural uses (document #51). Typical impacts to this environmental topic include rezoning agricultural land, e.g., dairy farms, to allow residential or commercial development to occur. The CEQA documents for the remaining primary facility categories: agricultural facilities; retail/services facilities; large commercial facilities; entertainment/recreational facilities; institutional facilities; transportation facilities; utility facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse light or glare impacts. Based on the results of the CEQA document survey and the possibility that future individual projects in any of these facility categories could be sited in or near a location that could convert prime farmland to non-agricultural uses, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental topic area.

Conflict with Agricultural Zoning/Williamson Act Contracts

The survey of the 52 CEQA documents shown in Table 5.2-1 revealed that no primary facility categories conflicted with agricultural zoning or Williamson Act Contracts. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in all of the nine facility categories could conflict with agricultural zoning and/or Williamson Act Contracts as a result of being sited in or near such locations, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Other Changes that Convert Agricultural Land to Non-agricultural Uses

The survey of the 52 CEQA documents shown in Table 5.2-1 revealed that no primary facility categories generated other changes that could convert agricultural land to non-agricultural uses. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects all of in the nine facility categories could generate other changes that could convert agricultural land to non-agricultural uses as a result of being sited in or near such locations, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Conflict with or Cause Rezoning of Forest Land

The survey of CEQA documents for the 52 CEQA documents prepared for past projects in all nine primary facility categories, did not include analysis of potential indirect impacts from the projects that have the potential to conflict with or cause rezoning of forest land because this requirement was not in effect at the time the 52 CEQA documents were prepared. Since future individual projects in all of the nine facility categories could have the potential to conflict with, or cause rezoning of forest land as a result of being sited in or near such locations, it is concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Other Changes that Convert Forest Land to Other Uses

The survey of CEQA documents for the 52 CEQA documents prepared for past projects in all nine primary facility categories, did not include analysis of potential indirect impacts from the projects that could cause other changes that convert forest land to other uses because this requirement was not in effect at the time the 52 CEQA documents were prepared. Consequently, no conclusions can be drawn from the survey regarding potential adverse impacts to forestry resources. Since future individual projects in all of the nine facility categories could have the potential to conflict with, or cause rezoning of forest land as a result of being sited in or near such locations and, it is concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Cumulative Impacts

Project impacts to agricultural and forestry resources could combine with impacts from other past, present and future projects, including projects permitted under SB 827, projects permitted in reliance on ERC's and new power plants entitled to receive offsets pursuant to state law. It is concluded that the proposed project would make a cumulatively considerable contribution to significant cumulative impacts to agricultural and resources.

Alternative A - No Project Alternative

Convert Prime Farmland to Non-agricultural Uses

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted, but SB 827 would be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is

reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from converting prime farmland to non-agricultural uses are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, there would be no conversion of farmland to non-agricultural uses when compared against the proposed project, so under the No Project Alternative potential future impacts from converting farmland to non-agricultural uses would not be significant when compared to the proposed project.

Conflict with Agricultural Zoning/Williamson Act Contracts

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted, but SB 827 would be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the District's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future projects that may conflict with agricultural zoning or Williamson Act Contracts are considered to be significant. Starting May 1, 2012, future facilities that previously would have had access to the SCAQMD's internal accounts, either through Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future that could conflict with agricultural zoning or Williamson Act Contracts when compared to the proposed project.

Other Changes that Convert Agricultural Land to Non-agricultural Uses

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted, but SB 827 would be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future projects that may cause other changes that convert agricultural land to non-agricultural uses are considered to be significant. Starting May 1, 2012, future facilities that previously would have had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012 no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district for other uses that could convert agricultural land to non-agricultural uses when compared to the proposed project.

Conflict with or Cause Rezoning of Forest Land

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted, but SB 827 would be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future project that could conflict with or cause rezoning forest land are considered to be significant. Starting May 1, 2012, future facilities that previously would have had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would

be constructed and operated in the future in the district for other uses that could conflict with, or cause rezoning forest land when compared to the proposed project.

Other Changes that Convert Forest Land to Other Uses

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted, but SB 827 would be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future projects that could cause other changes that convert forest land to other uses are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either through Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012 no projects that previously would have qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future that could convert forest land to other uses when compared to the proposed project.

Alternative B – Offset User Fees for Large Businesses

Convert Prime Farmland to Non-agricultural Uses

The survey of CEQA documents to evaluate the potential adverse indirect impacts from converting prime farmland to non-agricultural uses as a result of implementing the proposed project identified one primary facility category, the heavy industrial facility category, which would significantly adversely affect prime farmland use. For this reason and the possibility that future individual projects in this and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts as a result of converting prime farmland to non-agricultural uses, it was concluded that Alternative B would create significant adverse indirect impacts from converting prime farmland in the district to non-agricultural purposes.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from converting prime farmland to non-agricultural uses compared to the proposed project. The main difference between

Alternative B and the proposed project is Alternative B would result in indirect effects of potential future emission reduction projects paid for by mitigation fees that could convert prime agricultural land to non-agricultural uses. For example, a number of emission reduction projects could be located in or near agricultural areas, resulting in other uses of prime farmland. Such projects include, but are not limited to: wind turbines, solar collector panels, and construction of anaerobic digesters.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts as a result of converting prime farmland to other uses equivalent to or greater than the proposed project. The contribution to cumulative impacts from Alternative B as a result of converting prime farmland to non-agricultural uses is expected to be greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Conflict with Agricultural Zoning/Williamson Act Contracts

The survey of CEQA documents to evaluate the potential for impacts from future affected facilities that conflict with agricultural zoning or Williamson Act Contracts as a result of implementing the proposed project identified no primary facility categories that would significantly adversely conflict with agricultural zoning or Williamson Act Contracts. However, because of the possibility that future individual projects in any of the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse conflicts with agricultural zoning or Williamson Act Contracts, it was concluded that Alternative B would create significant adverse indirect impacts as a result of future land use conflicts with agricultural zoning or Williamson Act Contracts in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that could conflict with agricultural zoning or Williamson Act contracts compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects paid for by mitigation fees that could conflict with agricultural zoning or Williamson Act contract areas. For example, a number of emission reduction projects could be located in or near areas zoned agricultural or that are subject to Williamson Act contracts, resulting zoning conflicts. Such projects include, but are not limited to: wind turbines, solar collector panels, and construction of anaerobic digesters.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts agricultural zoning impacts equivalent to or greater than the proposed project. The contribution to cumulative impacts from Alternative B as a result of conflicts with agricultural zoning or Williamson Act contracts is expected to be greater

than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Other Changes that Convert Agricultural Land to Non-agricultural Uses

The survey of CEQA documents to evaluate the potential for other changes that could convert agricultural land to non-agricultural uses from the proposed project identified no primary facility categories that would significantly adversely cause other changes that could convert agricultural land to non-agricultural uses. However, because of the possibility that future individual projects in any of the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts as a result of other changes that could convert agricultural land to non-agricultural uses, it was concluded that Alternative B would create significant adverse indirect impacts on agricultural resources in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from other changes that could convert agricultural land to other uses compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects or other changes that could convert agricultural land to non-agricultural uses. For example, a number of emission reduction projects could be located in or near agricultural land, resulting in conversion of agricultural land to non-agricultural purposes. Such projects include, but are not limited to: wind turbines, solar collector panels, and construction of anaerobic digesters.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts on agriculturally zoned areas equivalent to or greater than the proposed project. The contribution to cumulative impacts from Alternative B as a result of converting agricultural land to other uses is expected to be greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Conflict with or Cause Rezoning of Forest Land

The survey of CEQA documents for the 52 CEQA documents prepared for past projects that represent projects in all nine primary facility categories, did not include analysis of potential indirect impacts from the projects that have the potential to conflict with or cause rezoning of forest land because this requirement was not in effect at the time the 52 CEQA documents were prepared. Since future individual projects in the nine facility

categories could have the potential to conflict with, or cause rezoning of forest land as a result of being sited in or near such locations and, using an abundance of caution, it is concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Because the same types of facilities would be built under Alternative B, under Alternative B would generate similar indirect impacts that could conflict with, or require rezoning of forest lands compared to the proposed project. The main difference between Alternative B and the proposed project is primarily the indirect effects of potential future emission reduction projects or other changes that could conflict with, or require rezoning of forest lands. For example, a number of emission reduction projects could be located in or near forest lands, resulting in conflict with, or require rezoning of forest lands. Such projects include, but are not limited to: wind turbines, solar collector panels, and construction of anaerobic digesters.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts to forest areas equivalent to or greater than the proposed project. The contribution to cumulative impacts from Alternative B as a result of potential conflicts with, or requirements to rezone forest lands is expected to be greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Other Changes that Convert Forest Land to Other Uses

The survey of CEQA documents for the 52 CEQA documents prepared for past projects that represent projects in all nine primary facility categories, did not include analyses of potential indirect impacts from the projects that have the potential to convert forest land to other uses because this requirement was not in effect at the time the 52 CEQA documents were prepared. Since future individual projects in the nine facility categories could have the potential to convert forest land to other uses as a result of being sited in or near such locations, it is concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts that could convert forest land to other uses compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects or other changes that could convert forest land to other uses. For example, a number of emission reduction projects could be located in or near forest lands, resulting in converting forest land to other uses. Such projects include, but are not limited to: wind turbines, solar collector panels, and construction of anaerobic digesters.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts as a result of converting forest land to other uses equivalent to or greater than the proposed project. The contribution to cumulative impacts from Alternative B as a result of converting forest land to other uses is expected to be greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Alternative C- Large Businesses Prohibited from Accessing Rule 1304 Exemptions

Convert Prime Farmland to Non-agricultural Uses

The survey of CEQA documents to evaluate the potential adverse indirect impacts from converting prime farmland to non-agricultural uses as a result of implementing the proposed project identified one primary facility category, the heavy industrial facility category, which would significantly adversely affect prime farmland use. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer impacts as a result of converting prime farmland to non-agricultural uses compared to the proposed project.

Based upon the above information, there would be fewer or less significant potential impacts as a result of converting prime farmland to non-agricultural uses from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts as a result of converting prime farmland to non-agricultural uses from implementing Alternative C would be significant, but less than the proposed project because fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Conflict with Agricultural Zoning/Williamson Act Contracts

The survey of CEQA documents to evaluate the potential for impacts from future affected facilities that conflict with agricultural zoning or Williamson Act Contracts as a result of implementing the proposed project identified no primary facility categories that would significantly adversely conflict with agricultural zoning or Williamson Act Contracts. Because fewer facilities could be built under Alternative C, Alternative C would generate similar impacts as a result of future projects conflicting with agricultural zoning or Williamson Act contracts compared to the proposed project.

Based upon the above information, there would be fewer or less significant potential impacts as a result of future projects conflicting with agricultural zoning or Williamson Act contracts from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts as a result of future projects conflicting with agricultural zoning or Williamson Act contracts from Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Other Changes that Convert Agricultural Land to Non-agricultural Uses

The survey of CEQA documents to evaluate the potential for other changes that could convert agricultural land to non-agricultural uses from the proposed project identified no primary facility categories that would significantly adversely cause other changes that could convert agricultural land to non-agricultural uses. Because fewer facilities could be built under Alternative C, Alternative C would generate similar impacts as a result of other changes that convert agricultural land to other uses compared to the proposed project.

Based upon the above information, there would be fewer or less significant potential impacts as a result of other changes that convert agricultural land to other uses from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts as a result of other changes that convert agricultural land to other uses from Alternative C are concluded to be significant, but would be less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Conflict with or Cause Rezoning of Forest Land

The survey of CEQA documents for the 52 CEQA documents prepared for past projects that represent projects in all nine primary facility categories, did not include analysis of potential indirect impacts from the projects that have the potential to conflict with or cause rezoning of forest land because this requirement was not in effect at the time the 52 CEQA documents were prepared. Since future individual projects in the nine facility categories could have the potential to conflict with, or cause rezoning of forest land as a result of being sited in or near such locations and, using an abundance of caution, it is concluded that the proposed project has the potential to create significant adverse

indirect impacts to this environmental category. Because fewer facilities could be built under Alternative C, Alternative C would generate similar impacts as a result of other changes that conflict with or cause rezoning of forest land as the proposed project.

Based upon the above information, there would be fewer or less significant potential impacts as a result of potential conflicts with, or rezoning of forest land from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts as a result of other changes that convert conflict with, or cause rezoning of forest land from Alternative C are concluded to be significant, but would be less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Other Changes that Convert Forest Land to Other Uses

The survey of CEQA documents for the 52 CEQA documents prepared for past projects that represent projects in all nine primary facility categories, did not include analyses of potential indirect impacts from the projects that have the potential to convert forest land to other uses because this requirement was not in effect at the time the 52 CEQA documents were prepared. Since future individual projects in the nine facility categories could have the potential to convert forest land to other uses as a result of being sited in or near such locations and, using an abundance of caution, it is concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category. Because fewer facilities could be built under Alternative C, Alternative C would generate similar impacts from changes that convert forest land to other uses compared to the proposed project.

Based upon the above information, there would be fewer or less significant potential impacts as a result of potential changes that could convert forest land to other uses from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts as a result of other changes that could convert forest land to other uses from Alternative C are concluded to be significant, but would be less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Alternative D - Use of Credits Generated in 2009 and Beyond Only

Convert Prime Farmland to Non-agricultural Uses

The survey of CEQA documents to evaluate the potential adverse indirect impacts from converting prime farmland to non-agricultural uses as a result of implementing the proposed project identified one primary facility category, the heavy industrial facility category, which would significantly adversely affect prime farmland use. For this reason and the possibility that future individual projects in this and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts as a result of converting prime farmland to non-agricultural uses, it was concluded that Alternative D would create significant adverse indirect impacts from converting prime farmland in the district to non-agricultural purposes. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of converting prime farmland to non-agricultural use.

Based upon the above information, indirect impacts from converting prime farmland to non-agricultural uses as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal offset accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse cumulative impacts from converting prime farmland to non-agricultural uses, but cumulative farmland impacts less than the proposed project.

Conflict with Agricultural Zoning/Williamson Act Contracts

The survey of CEQA documents to evaluate the potential for impacts from future affected facilities that conflict with agricultural zoning or Williamson Act Contracts as a result of implementing the proposed project identified no primary facility categories that would significantly adversely conflict with agricultural zoning or Williamson Act Contracts. However, because of the possibility that future individual projects in any of the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse conflicts with agricultural zoning or Williamson Act Contracts, it was concluded that Alternative D would create significant

adverse indirect impacts as a result of future land use conflicts with agricultural zoning or Williamson Act Contracts in the district. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of conflicts with agricultural zoning or Williamson Act Contracts.

Based upon the above information, indirect impacts as a result of future land use conflicts with agricultural zoning or Williamson Act Contracts as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis that could occur from converting prime agricultural land to non-agricultural uses. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse cumulative impacts from affected projects that have the potential to conflict with agricultural zoning or Williamson Act contracts, but cumulative agricultural land use impacts less than the proposed project.

Other Changes that Convert Agricultural Land to Non-agricultural Uses

The survey of CEQA documents to evaluate the potential for other changes that could convert agricultural land to non-agricultural uses from the proposed project identified no primary facility categories that would significantly adversely cause other changes that could convert agricultural land to non-agricultural uses. However, because of the possibility that future individual projects in any of the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts as a result of other changes that could convert agricultural land to non-agricultural uses, it was concluded that Alternative D would create significant adverse indirect impacts on agricultural resources in the district. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of conversion of agricultural land to non-agricultural uses.

Based upon the above information, indirect impacts from other changes that could convert agricultural land to non-agricultural uses as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new

credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse cumulative impacts, but cumulative impacts from converting farmland to other uses is expected to be less than the proposed project.

Conflict with or Cause Rezoning of Forest Land

The survey of CEQA documents for the 52 CEQA documents prepared for past projects that represent projects in all of the nine primary facility categories, did not include analysis of potential indirect impacts from the projects that have the potential to conflict with or cause rezoning of forest land because this requirement was not in effect at the time the 52 CEQA documents were prepared. Since future individual projects in the nine facility categories could have the potential to conflict with, or cause rezoning of forest land as a result of being sited in or near such locations and, using an abundance of caution, it is concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Based upon the above information, indirect impacts as a result of future land use projects that could conflict with, or cause rezoning of forest land as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis that could occur from conflicts with, or cause rezoning of forest land. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse cumulative impacts from affected projects that have the potential to conflict with, or cause rezoning of forest land, but cumulative forest land use impacts less than the proposed project.

Other Changes that Convert Forest Land to Other Uses

The survey of CEQA documents for the 52 CEQA documents prepared for past projects that represent projects in all nine primary facility categories, did not include analyses of

potential indirect impacts from the projects that have the potential to convert forest land to other uses because this requirement was not in effect at the time the 52 CEQA documents were prepared. Since future individual projects in the nine facility categories could have the potential to convert forest land to other uses as a result of being sited in or near such locations and, using an abundance of caution, it is concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of changes that convert forest land to other uses.

Based upon the above information, indirect impacts from other changes that could convert forest land to other uses as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse cumulative impacts, but cumulative impacts from changes that could convert forest land to other uses is expected to be less than the proposed project.

Alternative E – Limited Offset Availability

Convert Prime Farmland to Non-agricultural Uses

The survey of CEQA documents to evaluate the potential adverse indirect impacts from converting prime farmland to non-agricultural uses as a result of implementing the proposed project identified one primary facility category, the heavy industrial facility category, which would significantly adversely affect prime farmland use. For this reason and the possibility that future individual projects in this and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts as a result of converting prime farmland to non-agricultural uses, it was concluded that the proposed project would create significant adverse indirect impacts from converting prime farmland in the district to non-agricultural purposes. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of converting prime farmland to non-agricultural uses.

Indirect impacts from implementing Alternative E that could result in converting prime farmland to non-agricultural uses would be less than indirect farmland impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect farmland impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from converting prime agricultural land into non-agricultural uses as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Conflict with Agricultural Zoning/Williamson Act Contracts

The survey of CEQA documents to evaluate the potential for impacts from future affected facilities that conflict with agricultural zoning or Williamson Act Contracts as a result of implementing the proposed project identified no primary facility categories that would significantly adversely conflict with agricultural zoning or Williamson Act Contracts. However, because of the possibility that future individual projects in any of the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse conflicts with agricultural zoning or Williamson Act Contracts, it was concluded that the proposed project would create significant adverse indirect impacts as a result of future land use conflicts with agricultural zoning or Williamson Act Contracts in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of conflicts with agricultural zoning/Williamson Act Contracts.

Indirect impacts from future projects that have the potential to conflict with agricultural zoning or Williamson Act Contracts as a result of implementing Alternative E would be less than indirect agricultural conflict impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect agricultural conflict impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, cumulative impacts from future projects

that have the potential to conflict with agricultural zoning or Williamson Act Contracts as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Other Changes that Convert Agricultural Land to Non-agricultural Uses

The survey of CEQA documents to evaluate the potential for other changes that could convert agricultural land to non-agricultural uses from the proposed project identified no primary facility categories that would significantly adversely cause other changes that could convert agricultural land to non-agricultural uses. However, because of the possibility that future individual projects in any of the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts as a result of other changes that could convert agricultural land to non-agricultural uses, it was concluded that the proposed project would create significant adverse indirect impacts on agricultural resources in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of changes that convert agricultural land to non-agricultural uses.

Indirect impacts from future projects that have the potential to change or convert agricultural land to non-agricultural uses as a result of implementing Alternative E would be less than indirect impacts to agricultural land from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect agricultural land impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future projects that have the potential to change or convert agricultural land to non-agricultural uses as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Conflict with or Cause Rezoning of Forest Land

The survey of CEQA documents for the 52 CEQA documents prepared for past projects that represent projects in all nine primary facility categories, did not include analysis of potential indirect impacts from the projects that have the potential to conflict with or

cause rezoning of forest land because this requirement was not in effect at the time the 52 CEQA documents were prepared. Since future individual projects in the nine facility categories could have the potential to conflict with, or cause rezoning of forest land as a result of being sited in or near such locations and, using an abundance of caution, it is concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Indirect impacts from future projects that have the potential to conflict with, or cause rezoning of forest land as a result of implementing Alternative E would be less than indirect forest conflict impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, under Alternative E the SCAQMD would stop issuing permits. Based on the foregoing, indirect impacts from potential conflicts with, or cause rezoning of forest land as a result of implementing Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future projects that have the potential to conflict with, or cause rezoning of forest land as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Other Changes that Convert Forest Land to Other Uses

The survey of CEQA documents for the 52 CEQA documents prepared for past projects that represent projects in all nine primary facility categories, did not include analyses of potential indirect impacts from the projects that have the potential to convert forest land to other uses because this requirement was not in effect at the time the 52 CEQA documents were prepared. Consequently, no conclusions can be drawn from the survey regarding potential adverse impacts to forestry resources. Since future individual projects in the nine facility categories could have the potential to convert forest land to other uses as a result of being sited in or near such locations and, using an abundance of caution, it is concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of changes.

Indirect impacts from future projects that have the potential to convert forest land to other uses as a result of implementing Alternative E would be less than indirect impacts to forest land from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability

of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections under Alternative E for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect forest land impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, cumulative impacts from future projects that have the potential to change or convert forest land to other uses as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Air Quality

The analysis of direct and indirect air quality, visibility, health, and greenhouse gas impacts resulting from each project alternative can be found in Chapter 6.

Biological Resources

Proposed Project

It was concluded in the NOP/IS that the proposed project could adversely affect biological resources by allowing the development of individual projects in the future that qualify to receive emissions offsets available from the SCAQMD's internal accounts. Generally, typical impacts of a project on biological resources could include loss or destruction of sensitive species or degradation of sensitive habitat. Habitat degradation, interference with movement of wildlife species or migratory fish, and impacts on migratory wildlife corridors, or wildlife nursery sites may occur through grading or excavation, increases in water or air pollutants, increased noise, light, or vibration, interruption of fresh or salt water supplies, reduction in food supplies or foraging areas, or interference with established wildlife movement patterns on or between habitat areas.

The analysis in Subchapter 5.4 concludes that the proposed project has the potential to adversely affect biological resources. Mitigation of biological impacts would be the responsibility of the public agency (e.g., city or county) that would serve as lead agency on any given future project. Since the SCAQMD cannot predict how a future lead agency might choose to mitigate a particular significant biological impact, the potential exists for future indirect impacts to be significant and unavoidable (i.e., significant even after mitigation).

Habitat Modifications that Affect Sensitive/Endangered Species

The survey of the 52 CEQA documents shown in Table 5.4-1 revealed that transportation facility projects (document #39) have the potential to significantly adversely affect habitats and/or sensitive/endangered species. The CEQA documents for the remaining primary facility categories, agricultural facilities; retail/services facilities; large commercial facilities; entertainment/recreation facilities; institutional facilities; utility facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse indirect impacts to habitats or sensitive/endangered species. Based on the results of the CEQA document survey and the possibility that future individual projects in all of these facility categories could be sited in or near a location that could create significant adverse indirect impacts to habitats and/or sensitive/endangered species, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental topic.

Adversely Affect Riparian/Sensitive Habitats

The survey of the 52 CEQA documents shown in Table 5.4-1 revealed that no primary facility categories generated significant adverse indirect impacts to riparian/sensitive habitats. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in the nine facility categories could generate other changes that could significantly adversely affect riparian/sensitive habitats as a result of being sited in or near such locations, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Adversely Affect Federally Protected Wetlands

The survey of the 52 CEQA documents shown in Table 5.4-1 revealed that no primary facility categories generated significant adverse indirect impacts to federally protected wetlands. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in the nine facility categories could generate other changes that could significantly adversely affect federally protected wetlands as a result of being sited in or near such locations, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Interfere with the Movement of Resident or Migratory Species

The survey of the 52 CEQA documents shown in Table 5.4-1 revealed that institutional facility projects (document #35) have the potential to create significant adverse indirect impacts that could interfere with the movement of resident or migratory species. The

CEQA documents for the remaining primary facility categories, agricultural facilities; retail/services facilities; large commercial facilities; institutional facilities; transportation facilities; utility facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse indirect impacts that could interfere with the movement of resident or migratory species. Based on the results of the CEQA document survey and the possibility that future individual projects in all of these facility categories could be sited in or near a location that could create significant adverse indirect impacts interfering with the movement of resident or migratory species, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental topic area.

Conflict with Policies/Ordinances Protecting Biological Resources

The survey of the 52 CEQA documents shown in Table 5.4-1 revealed that entertainment/recreational facility projects (document #22) have the potential to create significant adverse indirect impacts that could conflict with policies/ordinance protecting biological resources. The CEQA documents for the remaining primary facility categories: agricultural facilities; retail/services facilities; large commercial facilities; institutional facilities; transportation facilities; utility facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse indirect impacts that could conflict with policies/ordinance protecting biological resources. Based on the results of the CEQA document survey and the possibility that future individual projects in all of these facility categories could be sited in or near a location that could create significant adverse indirect impacts that could conflict with policies/ordinance protecting biological resources, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental category.

Conflict with Habitat Conservation Plans

The survey of the 52 CEQA documents shown in Table 5.4-1 revealed that no primary facility categories generated significant adverse indirect impacts that conflict with habitat conservation plans. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in the nine facility categories could generate other changes that have the potential to conflict with habitat conservation plans as a result of being sited in or near such locations, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Cumulative Impacts

Project impacts to biological resources could combine with impacts from other past, present and future projects, including projects permitted under SB 827, projects

permitted in reliance on ERC's and new power plants entitled to receive offsets pursuant to state law. It was concluded that the proposed project would make a cumulatively considerable contribution to significant cumulative impacts to biological resources.

Alternative A - No Project Alternative

Habitat Modifications that Affect Sensitive/Endangered Species

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted, but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future projects that could create adverse habitat modifications that affect sensitive or endangered species are considered to be significant. Starting May 1, 2012, future facilities access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, there would be little or no modifications to habitat that could affect sensitive or endangered species as a result of implementing Alternative A, so under the No Project Alternative potentially significant adverse indirect impacts resulting from habitat modifications that could affect sensitive or endangered species would not be expected to occur beginning May 1, 2012. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Adversely Affect Riparian/Sensitive Habitats

Under Alternative A, after May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, there would be no newly constructed facilities in the future that could affect riparian or sensitive habitats as a result of implementing Alternative A.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts

from future projects that could adversely affect riparian or sensitive habitats are considered to be significant. Starting May 1, 2012, future facilities access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, there would be little or no modifications to habitat that could adversely affect riparian or sensitive habitats as a result of implementing Alternative A, so under the No Project Alternative potentially significant adverse indirect impacts resulting from future projects that could adversely affect riparian or sensitive habitats would not be expected to occur beginning May 1, 2012.

Adversely Affect Federally Protected Wetlands

Under Alternative A, after May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, there would be no newly constructed facilities beginning May 1, 2012 that could adversely affect federally protected wetlands as a result of implementing Alternative A. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future projects that could adversely affect federally protected wetlands are considered to be significant. Starting May 1, 2012, future facilities access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, there would be little or no modifications from future projects that could adversely affect federally protected wetlands as a result of implementing Alternative A, so under the No Project Alternative potentially significant adverse indirect impacts resulting from habitat modifications that could affect sensitive or endangered species would not be expected to occur beginning May 1, 2012.

Interfere with the Movement of Resident or Migratory Species

Under Alternative A, after May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, there would be no newly constructed facilities in the future that could interfere with the movement of resident or migratory species as a result of implementing Alternative A. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future projects that could interfere with the movement of resident or migratory species are considered to be significant. Starting May 1, 2012, future facilities access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, there would be little or no modifications to habitat that could interfere with the movement of resident or migratory species as a result of implementing Alternative A, so under the No Project Alternative potentially significant adverse indirect impacts resulting from habitat modifications that could affect sensitive or endangered species would not be expected to occur beginning May 1, 2012.

Conflict with Policies/Ordinances Protecting Biological Resources

Under Alternative A, after May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, there would be no newly constructed facilities in the future that could conflict with policies or ordinances protecting biological resources as a result of implementing Alternative A. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future projects that could conflict with policies or ordinances protecting biological resources are considered to be significant. Starting May 1, 2012, future facilities access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, there would be little or no modifications from future projects that could conflict with policies or ordinances protecting biological resources as a result of implementing Alternative A, so under the No Project Alternative potentially significant adverse indirect impacts resulting from habitat modifications that could affect sensitive or endangered species would not be expected to occur beginning May 1, 2012.

Conflict with Habitat Conservation Plans

Under Alternative A, after May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, there would be no newly constructed facilities in the future that could conflict with habitat

conservation plans as a result of implementing Alternative A. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future projects that could conflict with habitat conservation plans are considered to be significant. Starting May 1, 2012, future facilities access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, there would be little or no modifications from future projects that could conflict with habitat conservation plans as a result of implementing Alternative A, so under the No Project Alternative potentially significant adverse indirect impacts resulting from habitat modifications that could affect sensitive or endangered species would not be expected to occur beginning May 1, 2012.

Alternative B – Offset User Fees for Large Businesses

Habitat Modifications that Affect Sensitive/Endangered Species

The survey of CEQA documents to evaluate the potential for impacts as a result of land use projects that could create habitat modifications that could affect sensitive or endangered species from the proposed project identified one primary facility category, transportation facility projects, that would create significant adverse indirect impacts as a result of habitat modifications that could affect sensitive or endangered species. For this reason and the possibility that future individual projects in this and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts as a result of habitat modifications that could affect sensitive or endangered species, it was concluded that the proposed project would create significant adverse indirect impacts on habitats in the district that contain sensitive or endangered species.

Because the same types and numbers of facilities could be built under Alternative B, Alternative B would generate similar indirect habitat modification impacts compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in indirect effects of potential future emission reduction projects on habitats, resulting in adverse indirect impacts to sensitive or endangered species. For example, a number of emission reduction projects could be located in or near wildlife habitats, resulting in resulting adverse effects to sensitive or endangered species. Such projects include, but are not limited to: wind turbines and solar collector panels.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts on sensitive or endangered species through habitat modifications that

are equivalent to or greater than the proposed project. The contribution to cumulative impacts as a result of habitat modifications that could affect sensitive or endangered species from Alternative B are expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Adversely Affect Riparian/Sensitive Habitats

The survey of CEQA documents to evaluate the potential for adverse indirect impacts affecting riparian or sensitive habitats from the proposed project did not identify any primary facility categories that would significantly adversely affect riparian or sensitive habitats. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to riparian or sensitive habitats, it was concluded that the proposed project would create significant adverse indirect impacts affecting riparian or sensitive habitats.

Because the same types of facilities could be built under Alternative B, Alternative B would generate similar indirect impacts that could adversely affect riparian or sensitive habitats compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in indirect effects of potential future emission reduction projects on riparian or sensitive habitats. For example, a number of emission reduction projects could be located in or near riparian or sensitive habitats. Such projects include, but are not limited to: wind turbines, solar collector panels, and construction of anaerobic digesters.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts on riparian or sensitive habitats equivalent to or greater than the proposed project. The contribution cumulative impacts from Alternative B that have the potential to adversely affect riparian or sensitive habitats are expected to be greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Adversely Affect Federally Protected Wetlands

The survey of CEQA documents to evaluate the potential for impacts that could adversely affect federally protected wetlands from the proposed project did not identify any primary facility categories that would significantly adversely affect federally protected wetlands. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant impacts that could adversely affect federally

protected wetlands, it was concluded that the proposed project would create significant indirect impacts that could adversely affect federally protected wetlands in the district.

Because the same types and numbers of facilities could be built under Alternative B, Alternative B would generate similar indirect impacts to federally protected wetlands compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in indirect effects of potential future emission reduction projects on federally protected wetlands. For example, a number of emission reduction projects could be located in or near federally protected wetlands. Such projects include, but are not limited to: wind turbines, solar collector panels, and construction of anaerobic digesters.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts on federally protected wetlands equivalent to or greater than the proposed project. The contribution to cumulative impacts from Alternative B as a result of future projects adversely affecting federally protected wetlands is expected to be greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Interfere with the Movement of Resident or Migratory Species

The survey of CEQA documents to evaluate the potential for impacts from the proposed project identified one primary facility category, institutional facility projects, that would significantly interfere with the movement of resident or migratory species. For this reason and the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts as a result of land use projects interfering with the movement of resident or migratory species, it was concluded that the proposed project would create significant adverse indirect impacts as a result of future land use projects interfering with the movement of resident or migratory species in the district.

Because the same types and numbers of facilities could be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that could interfere with the movement of resident or migratory species compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in indirect effects of potential future emission reduction projects that may interfere with the movement of resident or migratory species. For example, a number of emission reduction projects could be located in or near areas that could impede or interfere with the movement of resident or migratory species. Such projects include, but are not limited to: wind turbines, and solar collector panels.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts on the movement of resident or migratory species equivalent to or greater than the proposed project. The contribution to cumulative impacts from Alternative B as a result of future projects that have the potential to interfere with the movement of resident or migratory species is expected to be greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Conflict with Policies/Ordinances Protecting Biological Resources

The survey of CEQA documents to evaluate the potential for conflicts with policies or ordinances protecting biological resources from the proposed project identified one primary facility category, entertainment/recreational facility projects, which would significantly conflict with policies or ordinances protecting biological resources. For this reason and the possibility that future individual projects in this and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse conflicts with policies or ordinances protecting biological resources impacts, it was concluded that Alternative B would create significant adverse indirect conflicts with policies or ordinances protecting biological resources in the district.

Because the same types and numbers of facilities could be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that could conflict with policies or ordinances protecting biological resources compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in indirect effects of potential future emission reduction projects that could conflict with policies or ordinance protecting biological resources. For example, a number of emission reduction projects could be located in or near areas containing important biological resources and, as a result, have the potential to indirectly conflict with policies or ordinances specifically designed to protect biological resources. Such projects include, but are not limited to: wind turbines, solar collector panels, and construction of anaerobic digesters.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts on biological resources equivalent to or greater than the proposed project. The contribution to cumulative impacts from Alternative B as a result of future projects that have the potential to conflict with policy ordinances protecting biological resources is expected to be greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Conflict with Habitat Conservation Plans

The survey of CEQA documents to evaluate the potential for conflicts with habitat conservation plans from the proposed project did not identify any primary facility categories that would significantly adversely conflict with habitat conservation plans. However, because of the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse conflicts with habitat conservation plans, it was concluded that the proposed project would create significant adverse indirect conflicts with habitat conservation plans in the district.

Because the same types and numbers of facilities could be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to conflict with habitat conservation plans compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in indirect effects of potential future emission reduction projects conflict with habitat conservation plans. For example, a number of emission reduction projects could be located in or near areas that include or are part of habitat conservation plans, which could substantially undermine the intended effects of the habitat conservation plans. Such projects include, but are not limited to: wind turbines, solar collector panels, and construction of anaerobic digesters.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts on areas that are part of or contain habitat conservation plans equivalent to or greater than the proposed project. The contribution to cumulative impacts from Alternative B as a result of future projects that have the potential to conflict with habitat conservation plans is expected to be greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Alternative C- Large Businesses Prohibited from Accessing Rule 1304 Exemptions

Habitat Modifications that Affect Sensitive/Endangered Species

The survey of CEQA documents to evaluate the potential for impacts as a result of land use projects that could create habitat modifications that could affect sensitive or endangered species from the proposed project identified one primary facility category, transportation facility projects, that would create significant adverse indirect impacts as a result of habitat modifications that could affect sensitive or endangered species. For this reason and the possibility that future individual projects in this and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts as a result of habitat modifications that

could affect sensitive or endangered species, it was concluded that the proposed project would create significant adverse indirect impacts on habitats in the district that contain sensitive or endangered species. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer impacts as a result of habitat modifications that have the potential to affect sensitive or endangered species compared to the proposed project.

Based upon the above information, indirect impacts would significant, but would be fewer or less significant potential impacts as a result of habitat modifications that have the potential to affect sensitive or endangered species from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts to from Alternative C as a result of habitat modifications that have the potential to affect sensitive or endangered species would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Adversely Affect Riparian/Sensitive Habitats

The survey of CEQA documents to evaluate the potential for adverse indirect impacts affecting riparian or sensitive habitats from the proposed project did not identify any primary facility categories that would significantly adversely affect riparian or sensitive habitats. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to riparian or sensitive habitats, it was concluded that the proposed project would create significant adverse indirect impacts affecting riparian or sensitive habitats. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer adverse affects to any riparian or sensitive habitats compared to the proposed project.

Based upon the above information, indirect impacts would significant, but would be fewer or less significant potential to generate adverse affects to any riparian or sensitive habitats from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts from Alternative C from future facilities that have the potential to generate adverse affects to any riparian or sensitive habitats would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Adversely Affect Federally Protected Wetlands

The survey of CEQA documents to evaluate the potential for impacts that could adversely affect federally protected wetlands from the proposed project did not identify any primary facility categories that would significantly adversely affect federally protected wetlands. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant impacts that could adversely affect federally protected wetlands, it was concluded that the proposed project would create significant indirect impacts that could adversely affect federally protected wetlands. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer impacts to federally protected wetlands compared to the proposed project.

Based upon the above information, indirect impacts would be significant, but would be fewer or less significant potential impacts to federally protected wetlands from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts to federally protected wetlands from implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Interfere with the Movement of Resident or Migratory Species

The survey of CEQA documents to evaluate the potential for impacts from the proposed project identified one primary facility category, institutional facility projects, that would significantly interfere with the movement of resident or migratory species. For this reason and the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts as a result of land use projects interfering with the movement of resident or migratory species, it was concluded that the proposed project would create significant adverse indirect impacts as a result of future land use projects interfering with the movement of resident or migratory species. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer indirect impacts from future projects that have the potential to interfere with the movement of resident or migratory species compared to the proposed project.

Based upon the above information, indirect impacts would be significant, but would be fewer or less significant potential indirect impacts from future projects that have the potential to interfere with the movement of resident or migratory species as a result of implementing Alternative C compared to the proposed project because large businesses

would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts from Alternative C from future projects that have the potential to interfere with the movement of resident or migratory species would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Conflict with Policies/Ordinances Protecting Biological Resources

The survey of CEQA documents to evaluate the potential for conflicts with policies or ordinances protecting biological resources from the proposed project identified one primary facility category, entertainment/recreational facility projects, that would significantly conflict with policies or ordinances protecting biological resources. For this reason and the possibility that future individual projects in this and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse conflicts with policies or ordinances protecting biological resources impacts, it was concluded that the proposed project would create significant adverse indirect conflicts with policies or ordinances protecting biological resources. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer impacts as a result of future projects conflicting with policy ordinances protecting biological resources compared to the proposed project.

Based upon the above information, indirect impacts would significant, but would be fewer or less significant potential impacts as a result of future projects conflicting with policy ordinances protecting biological resources from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts as a result of future projects conflicting with policy ordinances protecting biological resources from implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Conflict with Habitat Conservation Plans

The survey of CEQA documents to evaluate the potential for conflicts with habitat conservation plans from the proposed project did not identify any primary facility categories that would significantly adversely conflict with habitat conservation plans. However, because of the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse conflicts with habitat conservation plans, it

was concluded that the proposed project would create significant adverse indirect conflicts with habitat conservation plans. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer impacts as a result of potential future conflicts from affected facilities with habitat conservation plans compared to the proposed project.

Based upon the above information, indirect impacts would be significant, but would be fewer or less significant potential impacts as a result of potential future conflicts from affected facilities with habitat conservation plans from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts as a result of potential future conflicts from affected facilities with habitat conservation plans from implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Alternative D - Use of Credits Generated in 2009 and Beyond Only

Habitat Modifications that Affect Sensitive/Endangered Species

The survey of CEQA documents to evaluate the potential for impacts as a result of land use projects that could create habitat modifications that could affect sensitive or endangered species from the proposed project identified one primary facility category, transportation facility projects, that would create significant adverse indirect impacts as a result of habitat modifications that could affect sensitive or endangered species. For this reason and the possibility that future individual projects in this and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts as a result of habitat modifications that could affect sensitive or endangered species, it was concluded that the proposed project would create significant adverse indirect impacts on habitats that contain sensitive or endangered species. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts to sensitive or endangered species.

Based upon the above information, indirect impacts from habitat modifications that could affect sensitive or endangered species as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared

to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from projects that have the potential to generate habitat modifications that may affect sensitive or endangered species, but indirect cumulative impacts to sensitive or endangered species would be less than the proposed project.

Adversely Affect Riparian/Sensitive Habitats

The survey of CEQA documents to evaluate the potential for adverse indirect impacts affecting riparian or sensitive habitats from the proposed project identified no primary facility categories that would significantly adversely affect riparian or sensitive habitats. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to riparian or sensitive habitats, it was concluded that the proposed project would create significant adverse indirect impacts affecting riparian or sensitive habitats. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts to riparian or sensitive habitats.

Based upon the above information, indirect impacts from future land use projects that could adversely affect riparian or sensitive habitats as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from projects that have the potential to adversely affect riparian or sensitive habitats, but indirect cumulative impacts to riparian or sensitive habitats would be less than the proposed project.

Adversely Affect Federally Protected Wetlands

The survey of CEQA documents to evaluate the potential for impacts that could adversely affect federally protected wetlands from the proposed project identified no primary facility categories that would significantly adversely affect federally protected wetlands. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant impacts that could adversely affect federally protected wetlands, it was concluded that the proposed project would create significant indirect impacts that could adversely affect federally protected wetlands. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts to federally protected wetlands.

Based upon the above information, indirect impacts from future land use projects that could adversely affect federally protected wetlands as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from projects that have the potential to adversely affect federally protected wetlands, but indirect cumulative impacts to federally protected wetlands would be less than the proposed project.

Interfere with the Movement of Resident or Migratory Species

The survey of CEQA documents to evaluate the potential for impacts from the proposed project identified one primary facility category, institutional facility projects, that would significantly interfere with the movement of resident or migratory species. For this reason and the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts as a result of land use projects interfering with the movement of resident or migratory species, it was concluded that the proposed project would create significant adverse indirect impacts as a result of future land use projects interfering with the movement of resident or migratory species. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts to the movement of resident or migratory species.

Based upon the above information, indirect impacts from future land use projects that could interfere with the movement of resident or migratory species as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from projects that have the potential to interfere with the movement of resident or migratory species, but indirect cumulative impacts to resident or migratory species would be less than the proposed project.

Conflict with Policies/Ordinances Protecting Biological Resources

The survey of CEQA documents to evaluate the potential for conflicts with policies or ordinances protecting biological resources from the proposed project identified one primary facility category, entertainment/recreational facility projects, that would significantly conflict with policies or ordinances protecting biological resources. For this reason and the possibility that future individual projects in this and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse conflicts with policies or ordinances protecting biological resources impacts, it was concluded that the proposed project would create significant adverse indirect conflicts with policies or ordinances protecting biological resources. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts to the policies or ordinances protecting biological resources.

Based upon the above information, indirect impacts from future land use projects that could conflict with policies or ordinances protecting biological resources as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further,

only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from projects that have the potential to conflict with policy ordinances protecting biological resources, but indirect cumulative biological resources impacts would be less than the proposed project.

Conflict with Habitat Conservation Plans

The survey of CEQA documents to evaluate the potential for conflicts with habitat conservation plans from the proposed project identified no primary facility categories that would significantly adversely conflict with habitat conservation plans. However, because of the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse conflicts with habitat conservation plans, it was concluded that the proposed project would create significant adverse indirect impacts from conflicts with habitat conservation plans. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts to habitat conservation plans.

Based upon the above information, indirect impacts from conflicts with habitat conservation plans as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from projects that have the potential to conflict with habitat conservation plans, but indirect cumulative conflict impacts would be less than the proposed project.

Alternative E – Limited Offset Availability

Habitat Modifications that Affect Sensitive/Endangered Species

The analysis of potential adverse indirect impacts from habitat modifications that could affect sensitive or endangered species as a result of implementing Alternative E is based on comparing the relative merits of this alternative with the proposed project. The survey of CEQA documents to evaluate the potential for impacts as a result of land use projects that could create habitat modifications that could affect sensitive or endangered species from the proposed project identified one primary facility category, transportation facility projects, that would create significant adverse indirect impacts as a result of habitat modifications that could affect sensitive or endangered species. For this reason and the possibility that future individual projects in this and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts as a result of habitat modifications that could affect sensitive or endangered species, it was concluded that the proposed project would create significant adverse indirect impacts on habitats that contain sensitive or endangered species. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts to sensitive or endangered species.

Indirect impacts from habitat modifications that could affect sensitive or endangered species as a result of implementing Alternative E would be less than indirect impacts from habitat modifications that could affect sensitive or endangered species as result of implementing the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offsets demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, potential indirect impacts from future facilities that could result in habitat modifications that could affect sensitive or endangered species as a result of implementing Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from habitat modifications that could affect sensitive or endangered species as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Adversely Affect Riparian/Sensitive Habitats

The survey of CEQA documents to evaluate the potential for adverse indirect impacts affecting riparian or sensitive habitats from the proposed project identified no primary

facility categories that would significantly adversely affect riparian or sensitive habitats. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to riparian or sensitive habitats, it was concluded that the proposed project would create significant adverse indirect impacts affecting riparian or sensitive habitats. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts to riparian or sensitive habitats.

Indirect impacts to riparian or sensitive habitats from implementing Alternative E would be less than indirect impacts to riparian or sensitive habitats from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offsets demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect impacts to riparian or sensitive habitats from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts to riparian or sensitive habitats from implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Adversely Affect Federally Protected Wetlands

The survey of CEQA documents to evaluate the potential for impacts that could adversely affect federally protected wetlands from the proposed project identified no primary facility categories that would significantly adversely affect federally protected wetlands. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant impacts that could adversely affect federally protected wetlands, it was concluded that the proposed project would create significant indirect impacts that could adversely affect federally protected wetlands. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts to federally protected wetlands.

Indirect impacts to federally protected wetlands from implementing Alternative E would be less than indirect impacts to federally protected wetlands from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets

compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect impacts to federally protected wetlands from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts to federally protected wetlands from implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Interfere with the Movement of Resident or Migratory Species

The survey of CEQA documents to evaluate the potential for impacts from the proposed project identified one primary facility category, institutional facility projects, that would significantly interfere with the movement of resident or migratory species. For this reason and the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts as a result of land use projects interfering with the movement of resident or migratory species, it was concluded that the proposed project would create significant adverse indirect impacts as a result of future land use projects interfering with the movement of resident or migratory species. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts to the movement of resident or migratory species.

Indirect impacts from future projects that have the potential of interfering with the movement of resident or migratory species as a result of implementing Alternative E would be less than indirect movement or migration interference impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offsets demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect movement or migration impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative from future projects that have the potential of interfering with the movement of resident or migratory species as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Conflict with Policies/Ordinances Protecting Biological Resources

The survey of CEQA documents to evaluate the potential for conflicts with policies or ordinances protecting biological resources from the proposed project identified one primary facility category, entertainment/recreational facility projects, which could significantly conflict with policies or ordinances protecting biological resources. For this reason and the possibility that future individual projects in this and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse conflicts with policies or ordinances protecting biological resources impacts, it was concluded that the proposed project would create significant adverse indirect conflicts with policies or ordinances protecting biological resources. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts to the policies or ordinances protecting biological resources.

Indirect impacts from future projects that have the potential to conflict with policies or ordinances protecting biological resources as a result of implementing Alternative E would be less than indirect policy or ordinance impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offsets demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect policy or ordinance impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future projects that have the potential to conflict with policies or ordinances protecting biological resources as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Conflict with Habitat Conservation Plans

The survey of CEQA documents to evaluate the potential for conflicts with habitat conservation plans from the proposed project identified no primary facility categories that would significantly adversely conflict with habitat conservation plans. However, because of the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse conflicts with habitat conservation plans, it was concluded that the proposed project would create significant adverse indirect impacts from conflicts with habitat conservation plans. Because fewer facilities could be built

under Alternative E, Alternative E would generate similar but fewer impacts to habitat conservation plans.

Indirect impacts from future projects that have the potential to conflict with habitat conservation plans as a result of implementing Alternative E would be less than indirect habitat conservation plan impacts from the proposed project because fewer representative facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offsets demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect habitat conservation plan impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future projects that have the potential to conflict with habitat conservation plans as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Cultural Resources

Proposed Project

In the NOP/IS for the proposed project, it was concluded that the proposed project would not generate significant adverse cultural resources impacts. The rationale for this conclusion was as follows. There are existing laws in place that are designed to protect and mitigate potential impacts to cultural resources. Historical or archaeological resource databases are expected to be checked before a new facility is constructed. As discussed in the following subsections, SCAQMD staff has taken a more conservative approach and concluded that there may be situations where some types of projects could be located in areas that could adversely affect cultural resources. Cultural resources impacts could include the demolition of historical or paleontological structures or disturbing human remains.

The analysis in Subchapter 5.05 concludes that the proposed project has the potential to adversely affect cultural resources. Mitigation of cultural impacts would be the responsibility of the public agency (e.g., city or county) that would serve as lead agency on any given future project. Since the SCAQMD cannot predict how a future lead agency might choose to mitigate a particular significant cultural resource impact, the potential exists for future indirect impacts to be significant and unavoidable (i.e., significant even after mitigation).

Adversely Affect Historical Resources

The survey of the 52 CEQA documents shown in Table 5.5-1 revealed that retail/services facilities (documents #5, #6, and #8) and institutional facilities (documents #24 and #37) have the potential to create significant impacts that could adversely affect cultural resources. The CEQA documents for the remaining primary facility categories: agricultural facilities; large commercial facilities; entertainment facilities; transportation facilities; utility facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse indirect impacts to historical resources. Based on the results of the CEQA document survey and the possibility that future individual projects in any of the primary facility categories could be sited in or near a location that could create significant adverse indirect impacts to historical resources, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental category.

Adversely Affect Archaeological Resources

The survey of the 52 CEQA documents shown in Table 5.5-1 revealed that no primary facility categories generated significant adverse indirect impacts that could adversely affect archaeological resources. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in any of the nine facility categories could generate other changes that could significantly adversely affect archaeological resources as a result of being sited in or near such locations, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Destroy Paleontological/Geologic Resources

The survey of the 52 CEQA documents shown in Table 5.5-1 revealed that transportation facilities (document #39) have the potential to create significant adverse indirect impacts that could destroy paleontological/geological resources. The CEQA documents for the remaining primary facility categories: agricultural facilities; retail/services facilities; large commercial facilities; entertainment facilities; institutional facilities; utility facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse indirect impacts that could destroy paleontological/geological resources. Based on the results of the CEQA document survey and the possibility that future individual projects in any of these facility categories could be sited in or near a location that could create significant adverse indirect impacts resulting in the destruction of paleontological/geological resources, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental category.

Disturb Human Remains

The survey of the 52 CEQA documents shown in Table 5.5-1 revealed that no primary facility categories generated significant adverse indirect impacts that could disturb human remains. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in the nine facility categories could generate other changes that could significantly adversely disturb human remains as a result of being sited in or near locations where such remains could be found, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Cumulative Impacts

Project impacts to cultural resources could combine with impacts from other past, present and future projects, including projects permitted under SB 827, projects permitted in reliance on ERC's and new power plants entitled to receive offsets pursuant to state law. It is concluded that the proposed project would make a cumulatively considerable contribution to significant cumulative impacts to cultural resources.

Alternative A - No Project Alternative

Adversely Affect Historical Resources

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future projects that could adversely affect historical resources are considered to be significant. Starting May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that could adversely affect historical resources when compared against the proposed project. Therefore, after May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that could adversely affect historical resources when compared against the proposed project. As a result, under the No Project Alternative potential indirect impacts

from future projects constructed and operated in the district that could adversely affect historical resources would not be expected to occur after May 1, 2012.

Adversely Affect Archaeological Resources

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future projects that could adversely affect archaeological resources are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either through Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that could adversely affect archaeological resources when compared against the proposed project. As a result, under the No Project Alternative potential indirect impacts from future projects constructed and operated in the district that could adversely affect archaeological resources would not be expected to occur after May 1, 2012.

Destroy Paleontological/Geologic Resources

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to destroy paleontological or geologic resources are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. As a result, only new or

modified facilities that obtain credits on the open market for offset purposes would be able to obtain permits to construct and operate in the future. Projects that obtain credits on the open market are outside the scope of the analysis of the proposed project. Therefore, after May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that could destroy paleontological or geological resources when compared against the proposed project. As a result, under the No Project Alternative potential indirect impacts from future projects constructed and operated in the district that could destroy paleontological or geological resources would not be expected to occur after May 1, 2012.

Disturb Human Remains

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future projects that could disturb human remains are considered to be significant. Starting May 1, 2012, future projects that previously would have had access to the SCAQMD's internal accounts, either through Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012 no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that could disturb human remains when compared against the proposed project. As a result, under the No Project Alternative potential indirect impacts from future projects constructed and operated in the district that could disturb human remains would not be expected to occur after May 1, 2012.

Alternative B – Offset User Fees for Large Businesses

Adversely Affect Historical Resources

The survey of CEQA documents to evaluate the potential for adverse indirect impacts to historical resources from the proposed project identified the following primary facility categories that would significantly adversely affect historical resources: retail/services

facilities and institutional facilities. For this reason and the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to historical resources, it was concluded that the proposed project would create significant adverse indirect impacts on historical resources in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts to historical resources compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects that could adversely affect historical resources. For example, a number of emission reduction projects could be located in or near areas that contain historical resources. Such projects include, but are not limited to, renewable energy projects such as wind turbines, solar collector panels, and biosolids energy production.

For the above reasons, it is concluded that the proposed project would create significant adverse indirect impacts to historical resources greater than the proposed project. The contribution to cumulative historical resources impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Adversely Affect Archaeological Resources

The survey of CEQA documents to evaluate the potential for adverse indirect impacts to archaeological resources from the proposed project identified no primary facility categories that would significantly adversely affect archaeological resources. However, because of the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to archaeological resources, it was concluded that the Alternative B would create significant adverse indirect impacts on archaeological resources in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts to archaeological resources compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B would result in the indirect effects of potential future emission reduction projects that could adversely affect archaeological resources. For example, a number of emission reduction projects could be located in or near areas that contain archaeological resources, resulting in adverse indirect impacts to such resources. Such projects include, but are not limited to wind turbines, solar collector panels, and biosolids energy production.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts on archaeological resources greater than the proposed project. The contribution to cumulative archaeological resources impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Destroy Paleontological/Geologic Resources

The survey of CEQA documents to evaluate the potential for destruction of paleontological or geologic resources from the proposed project identified one primary facility category, transportation facilities, that would significantly adversely affect or destroy paleontological or geologic resources. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts as a result of destroying paleontological or geologic resources, it was concluded that the proposed project would create significant adverse indirect impacts through destruction of paleontological or geologic resources in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts to paleontological or geologic resources compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B would also result in the indirect effects of potential future emission reduction projects in areas that contain paleontological or geological resources. For example, a number of emission reduction projects could be located in or near areas that contain paleontological or geological resources that could be destroyed during construction activities. Such projects include, but are not limited to: wind turbines, solar collector panels, and biosolids energy production.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts on paleontological or geological resources that are greater than the proposed project. The contribution to cumulative impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Disturb Human Remains

The survey of CEQA documents to evaluate the potential for future projects to disturb human remains from the proposed project identified no primary facility categories that would significantly adversely affect human remains interred outside of formal

cemeteries. However, because of the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to human remains, it was concluded that the proposed project would create significant adverse indirect impacts to human remains interred outside of formal cemeteries in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to disturb human remains compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B would also result in the indirect effects of potential future emission reduction projects on habitats, resulting in adverse indirect impacts to sensitive or endangered species. For example, a number of emission reduction projects could be located in or near wildlife habitats, resulting in resulting adverse effects to sensitive or endangered species. Such projects include, but are not limited to: wind turbines, and solar collector panels.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts on sensitive or endangered species through habitat modifications that are greater than the proposed project. The contribution to cumulative impacts from Alternative B as a result of future projects that have the potential to disturb human remains is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Alternative C- Large Businesses Prohibited from Accessing Rule 1304 Exemptions

Adversely Affect Historical Resources

The survey of CEQA documents to evaluate the potential for adverse indirect impacts to historical resources from the proposed project identified the following primary facility categories that would significantly adversely affect historical resources: retail/services facilities and institutional facilities. For this reason and the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to historical resources, it was concluded that the proposed project would create significant adverse indirect impacts on historical resources in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer historical resources impacts compared to the proposed project.

Based upon the above information, indirect impacts that could result in destroying historical resources from implementing Alternative C are significant, but would be less compared to the proposed project because large businesses would no longer qualify for

the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts to historical resources from Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Adversely Affect Archaeological Resources

The survey of CEQA documents to evaluate the potential for adverse indirect impacts to archaeological resources from the proposed project identified no primary facility categories that would significantly adversely affect archaeological resources. However, because of the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to archaeological resources, it was concluded that the proposed project would create significant adverse indirect impacts on archaeological resources in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer archaeological resources impacts compared to the proposed project.

Based upon the above information, indirect impacts that could result in destroying archaeological resources from implementing Alternative C are significant, but less significant compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts to archaeological resources from Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Destroy Paleontological/Geologic Resources

The survey of CEQA documents to evaluate the potential for destruction of paleontological or geologic resources from the proposed project identified one primary facility category, transportation facilities, that would significantly adversely affect or destroy paleontological or geologic resources. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts as a result of destroying paleontological or geologic resources, it was concluded that the proposed project would create significant adverse indirect impacts through destruction of paleontological or geologic resources in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar

or fewer impacts that could destroy paleontological or geologic resources compared to the proposed project.

Based upon the above information, indirect impacts that could result in destroying paleontological or geologic resources from implementing Alternative C are significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts to paleontological or geologic resources from Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Disturb Human Remains

The survey of CEQA documents to evaluate the potential for future projects to disturb human remains from the proposed project identified no primary facility categories that would significantly adversely affect human remains interred outside of formal cemeteries. However, because of the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to human remains, it was concluded that the proposed project would create significant adverse indirect impacts to human remains interred outside of formal cemeteries in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer indirect impacts from future facilities sited in locations that could disturb human remains compared to the proposed project.

Based upon the above information, indirect impacts would be significant as a result of siting future facilities in locations that could disturb human remains as a result of implementing Alternative C, but would be less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts to from Alternative C from siting future facilities in locations that could disturb human remains would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Alternative D - Use of Credits Generated in 2009 and Beyond Only

Adversely Affect Historical Resources

The survey of CEQA documents to evaluate the potential for adverse indirect impacts to historical resources from the proposed project identified the following primary facility categories that would significantly adversely affect historical resources: retail/services facilities and institutional facilities. For this reason and the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to historical resources, it was concluded that the proposed project would create significant adverse indirect impacts on historical resources in the district. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts to historical resources.

Based upon the above information, indirect impacts to historical resources as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from projects that have the potential to adversely affect historical resources, but indirect cumulative historical resources impacts would be less than under the proposed project.

Adversely Affect Archaeological Resources

The survey of CEQA documents to evaluate the potential for adverse indirect impacts to archaeological resources from the proposed project identified no primary facility categories that would significantly adversely affect archaeological resources. However, because of the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to archaeological resources, it was concluded that the proposed project would create significant adverse indirect impacts on archaeological resources in the district. Because fewer facilities could be built under

Alternative D, Alternative D would generate similar but fewer impacts to adversely affect archaeological resources.

Based upon the above information, indirect impacts to archaeological resources as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from projects that have the potential to adversely affect archaeological resources, but indirect cumulative archaeological resources impacts would be less than under the proposed project.

Destroy Paleontological/Geologic Resources

The survey of CEQA documents to evaluate the potential for destruction of paleontological or geologic resources from the proposed project identified one primary facility category, transportation facilities, that would significantly adversely affect or destroy paleontological or geologic resources. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts as a result of destroying paleontological or geologic resources, it was concluded that the proposed project would create significant adverse indirect impacts through destruction of paleontological or geologic resources in the district. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts to destroy paleontological/geologic resources.

Based upon the above information, indirect impacts from future land use projects that have the potential to destroy paleontological or geologic resources as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further,

only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from projects that have the potential to destroy paleontological or geologic resources, but indirect cumulative paleontological or geological resources impacts would be less than under the proposed project.

Disturb Human Remains

The survey of CEQA documents to evaluate the potential for future projects to disturb human remains from the proposed project identified no primary facility categories that would significantly adversely affect human remains interred outside of formal cemeteries. However, because of the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to human remains, it was concluded that the proposed project would create significant adverse indirect impacts to human remains interred outside of formal cemeteries in the district.

Based upon the above information, indirect impacts from the potential for future land use projects to disturb human remains interred outside of formal cemeteries as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from projects that have the potential to disturb human remains, but indirect cumulative impacts to human remains would be less than under the proposed project.

Alternative E – Limited Offset Availability

Adversely Affect Historical Resources

The survey of CEQA documents to evaluate the potential for adverse indirect impacts to historical resources from the proposed project identified the following primary facility

categories that would significantly adversely affect historical resources: retail/services facilities and institutional facilities. For this reason and the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to historical resources, it was concluded that the proposed project would create significant adverse indirect impacts on historical resources in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts to adversely affect historical resources.

Indirect historical resources impacts from implementing Alternative E would be less than indirect historical resources impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect historical resources impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative historical resources impacts from implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Adversely Affect Archaeological Resources

The analysis of potential adverse indirect impacts to archaeological resources as a result of implementing Alternative E is based on comparing the relative merits of this alternative with the proposed project. The survey of CEQA documents to evaluate the potential for adverse indirect impacts to archaeological resources from the proposed project identified no primary facility categories that would significantly adversely affect archaeological resources. However, because of the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to archaeological resources, it was concluded that the proposed project would create significant adverse indirect impacts on archaeological resources in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts to adversely affect archaeological resources.

Indirect archaeological resources impacts from implementing Alternative E would be less than indirect archaeological resources impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by

the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect archaeological resources impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative archaeological resources impacts from implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Destroy Paleontological/Geologic Resources

The survey of CEQA documents to evaluate the potential for destruction of paleontological or geologic resources from the proposed project identified one primary facility category, transportation facilities, that would significantly adversely affect or destroy paleontological or geologic resources. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts as a result of destroying paleontological or geologic resources, it was concluded that the proposed project would create significant adverse indirect impacts through destruction of paleontological or geologic resources in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts to destroy paleontological/geologic resources.

Indirect paleontological or geologic resources impacts from implementing Alternative E would be less than indirect paleontological or geologic resources impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect paleontological or geologic resources impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative paleontological or geologic resources impacts from implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Disturb Human Remains

The survey of CEQA documents to evaluate the potential for future projects to disturb human remains from the proposed project identified no primary facility categories that would significantly adversely affect human remains interred outside of formal cemeteries. However, because of the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to human remains, it was concluded that the proposed project would create significant adverse indirect impacts to human remains interred outside of formal cemeteries in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of disturbing human remains.

Indirect impacts to human remains interred outside of formal cemeteries in the district from implementing Alternative E would be less than indirect impacts to human remains interred outside of formal cemeteries in the district from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If debit demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect impacts to human remains interred outside of formal cemeteries in the district from Alternative E would be significant, but less compared to the proposed project. Similarly, cumulative impacts to human remains interred outside of formal cemeteries in the district from implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Energy

Proposed Project

The NOP/IS prepared for the proposed project indicated that it has the potential to generate significant adverse energy impacts, primarily as a result of increased demand for energy resources from future facilities that obtain offsets from the SCAQMD's internal account. Energy impacts would generally consist of increased demand for energy resources as a result of constructing and operating future facilities that obtain offsets from the SCAQMD's internal accounts. The analysis in Subchapter 5.6 concludes that the proposed project has the potential to significantly adversely affect such resources. Mitigation of energy resources impacts would be the responsibility of the public agency (e.g., city or county) that would serve as lead agency on any given future project. Since the SCAQMD cannot predict how a future lead agency might choose to mitigate a particular significant energy resources impact, the potential exists

for future impacts to be significant and unavoidable (i.e., significant even after mitigation).

Because it is foreseeable at this time that at least one electric power generating facility (and possibly two others) will qualify as an eligible facility pursuant to AB 1318, impacts from this facility are considered to be reasonably foreseeable. Eligible facilities obtaining offsets pursuant to AB 1318 are not part of the proposed project, but could be considered a related project. Therefore, potential cumulative impacts from eligible facilities have been addressed in the cumulative impacts analysis in the subchapters in Chapter 5.

Conflict with Adopted Conservation Plans

The survey of the 52 CEQA documents shown in Table 5.6-1 revealed that no primary facility categories generated significant adverse indirect impacts that could conflict with adopted conservation plans. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in the nine facility categories could generate other changes that could conflict with adopted conservation plans as a result of increased future energy demands from a variety of primary facility categories, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Create a Need for New Power or Utility Systems

The survey of the 52 CEQA documents shown in Table 5.6-1 revealed that no primary facility categories generated significant adverse indirect impacts that could create a need for new power or utility systems. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in any of the nine facility categories could generate other changes that could create a need for new power or utility systems as a result of increased future energy demands from a variety of facility categories, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Create a Significant Effect on Energy Supplies

The survey of the 52 CEQA documents shown in Table 5.6-1 revealed that no primary facility categories generated significant adverse indirect impacts that could create a significant effect on energy supplies. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, the possibility that future individual projects in any of the nine facility

categories could generate other changes that could create a significant effect on energy supplies as a result of increased future energy demands from a variety of facility categories, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Comply with Existing Energy Standards

The survey of the 52 CEQA documents shown in Table 5.6-1 revealed that no primary facility categories generated significant adverse indirect impacts that could violate energy standards in the future. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in any of the nine facility categories could generate other changes that could cause a violation of energy standards in the future as a result of increased future energy demands from a variety of facility categories and, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Cumulative Impacts

Project impacts to energy resources could combine with impacts from other past, present and future projects, including projects permitted under SB 827, projects permitted in reliance on ERC's and new power plants entitled to receive offsets pursuant to state law. It is concluded that the proposed project would make a cumulatively considerable contribution to significant cumulative impacts to energy resources.

Alternative A - No Project Alternative

Conflict with Adopted Conservation Plans

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future projects that could conflict with adopted conservation plans are considered to be significant. Starting May 1, 2012, future facilities that would have had access to

the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1 would no longer have access to these sources of offsets. Therefore, after May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that could conflict with adopted energy conservation plans.

Create a Need for New Power or Utility Systems

Under Alternative A, after May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either through Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012 no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that would create a need for new power or utility systems. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future projects that could create a need for new power or utility systems are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1 would no longer have access to these sources of offsets. Therefore, after May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that could create a need for new power or utility systems.

Create a Significant Effect on Energy Supplies

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, after May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012 no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed

and operated in the future in the district that would create significant effects on energy supplies. However, projects that could improve energy efficiency also could not occur. For example, as shown in Appendix H – Facilities Affected by Permit Moratorium, there were 1,178 permit applications for new or modified equipment on hold. Examples of permit applications for new or modified equipment that were on hold include: new boilers, burners, cogeneration units, engines, and air pollution control equipment (e.g., thermal oxidizers, spray booths). In particular, there were a number of pending permit applications that would replace existing flares with electricity or steam generating equipment that, reduce electricity demand from the electricity grid.

The No Project Alternative could also have an adverse effect on the production of renewable energy. In September 2009 Governor Schwarzenegger signed Executive Order S-21-09 which increases California's Renewable Portfolio Standard to 33 percent by the year 2020. Generating electricity through the use of renewable fuels such as landfill gas is one means of displacing energy generation by fossil fuels, which helps reduce GHG emissions. For example, in addition to controlling landfill gas by combusting it in flares, it can also be controlled by combusting it in a gas turbine or internal combustion engine to generate renewable energy. As can be seen in Appendix H, under the permit moratorium that ended as of January 1, 2010, there were pending permit applications for: five electrical generating engines at a landfill in Irvine; electrical generating engines at a landfill in Rolling Hills Estates; electrical generating engines at a landfill in West Covina; replacement of an old, inefficient boiler with a more efficient boiler to generate steam at a landfill in Fountain Valley; electrical generating engines at a landfill in Brea; and electrical generating engines at a landfill in Sylmar.

Therefore, under the No Project Alternative after May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district and, as a result, significant indirect effects on energy supplies are not anticipated. However, beneficial electricity generating projects, such as renewable energy projects, would not be built. In the long term, it is expected that impacts to energy supplies from the No Project Alternative would be significant,

Comply with Existing Energy Standards

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's offset accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to violate energy standards are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012 no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that could violate existing energy standards when compared to the proposed project.

Under the No Project Alternative after May 1, 2012, existing equipment would be expected to operate indefinitely into the future without replacement or modification because of the permit moratorium. Since most equipment has a useful lifetime duration, at some point in the future existing equipment would be expected to experience breakdowns and other types of failures that could result in increasing violations of existing energy standards, especially equipment that has already been in operation for a number of years. Further, old, inefficient equipment could not be replaced by new and more efficient equipment, thus exacerbating potential violations of existing energy standards.

As time goes by it is expected that the probability of aging equipment violating existing energy standards could potentially increase. Consequently, under the No Project Alternative, potential impacts of aging combustion equipment violating existing energy standards are considered to be significant.

Alternative B – Offset User Fees for Large Businesses

Conflict with Adopted Energy Conservation Plans

The survey of CEQA documents to evaluate the potential for conflicts with adopted energy conservation plans from the proposed project identified no primary facility categories that would significantly adversely conflict with adopted energy conservation plans. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse conflicts with adopted energy conservation plans, it was concluded that the proposed project would create significant adverse indirect conflicts with adopted energy conservation plans.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B would also result in the indirect effects of potential future emission reduction projects on adopted conservation plans. For example, most emission reduction projects identified for

Alternative B promote renewable energy projects (e.g., wind turbines, and solar collector panels), increase energy efficiency (e.g., development of better energy storage capacity, and capturing energy losses during transmissions), or require replacing one type of fuel, e.g., diesel, with cleaner burning Alternative Fuels such as compressed natural gas, and electric motors. However, because future individual projects in the primary facility categories could have unique characteristics and/or include energy intensive equipment, the analysis in this PEA assumes Alternative B would create significant adverse indirect impacts as a result of potential conflicts with adopted conservation plans. The contribution to cumulative impacts is expected to be less than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects that may include renewable energy sources or energy efficiency measures.

Create a Need for New Power or Utility Systems

The survey of CEQA documents to evaluate projects that have the potential to create a need for new power or utility systems from the proposed project identified no primary facility categories that would create a need for new power or utility systems. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or create significant need in the future for new power or utility systems, it was concluded that the proposed project would create significant adverse indirect impacts in the district from new land use projects increasing the need for new power or utility systems.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to create a need for new power or utility systems compared to the proposed project. The main difference between Alternative B and the proposed project is primarily the indirect effects of potential future emission reduction projects relative to the need for new power or utility systems. For example, most emission reduction projects identified for Alternative B promote renewable energy projects (e.g., wind turbines, and solar collector panels), increase energy efficiency (e.g., development of better energy storage capacity, and capturing energy losses during transmissions), or require replacing one type of fuel, e.g., diesel, with cleaner burning Alternative Fuels such as compressed natural gas, and electric motors. However, because future individual projects in the primary facility categories could have unique characteristics and/or include energy intensive equipment, the analysis in this PEA assumes that Alternative B would create significant adverse indirect impacts as a result of creating a need for new power or utility systems. Cumulative impacts from future Alternative B projects that have the potential to increase the need for new power or utility systems is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future

effects of constructing and operating potential emission reduction projects that may include renewable energy sources or energy efficiency measures.

Create a Significant Effect on Energy Supplies

The survey of CEQA documents to evaluate the potential for significant effects on energy supplies from the proposed project identified no primary facility categories that would significantly adversely affect energy supplies. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics that could create significant adverse effects on energy supplies, it was concluded that the proposed project would create significant adverse indirect effects on energy supplies.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to create significant effects on energy supplies compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects, which have the potential to create beneficial effects on energy supplies. For example, most emission reduction projects identified for Alternative B promote renewable energy projects (e.g., wind turbines, and solar collector panels), increase energy efficiency (e.g., development of better energy storage capacity, capturing energy losses during transmissions), or require replacing one type of fuel, e.g., diesel, with cleaner burning Alternative Fuels such as compressed natural gas, and electric motors. Because future individual projects in the primary facility categories could have unique characteristics and/or include energy intensive equipment, the analysis in this PEA and assumes that Alternative B would create significant adverse indirect impacts in the future on energy supplies. The contribution to cumulative impacts from future Alternative B projects that have the potential to create significant effects on energy supplies is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects as well as the future effects of constructing and operating potential emission reduction projects that may include renewable energy sources or energy efficiency measures.

Comply with Existing Energy Standards

The survey of CEQA documents to evaluate the potential for impacts resulting from future land use projects violating existing energy standards as a result of implementing the proposed project identified no primary facility categories that would create significant adverse indirect impacts through violations of existing energy standards. However, because of the possibility that future individual projects in the primary facility

categories could have unique characteristics and/or be constructed in such a way that could exceed existing energy standards, it was concluded that the proposed project would create significant adverse indirect impacts on existing energy standards.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects on existing energy standards. For example, most emission reduction projects identified for Alternative B: promote renewable energy projects (e.g., wind turbines, solar collector panels), increase energy efficiency (e.g., development of better energy storage capacity, capturing energy losses during transmissions), or require replacing one type of fuel, e.g., diesel, with cleaner burning Alternative Fuels such as compressed natural gas, and electric motors. Because future individual projects in the primary facility categories could have unique characteristics and/or include energy intensive equipment, the analysis in this PEA assumes that Alternative B would create significant adverse indirect impacts as a result of potential conflicts with existing energy standards. The contribution to cumulative impacts from future Alternative B projects that have the potential to exceed existing energy standards are expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects as well as the future effects of constructing and operating potential emission reduction projects that may include renewable energy sources or energy efficiency measures.

Alternative C – Large Businesses Prohibited from Accessing Rule 1304 Exemptions

Conflict with Adopted Conservation Plans

The survey of CEQA documents to evaluate the potential for conflicts with adopted energy conservation plans from the proposed project identified no primary facility categories that would significantly adversely conflict with adopted energy conservation plans. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse conflicts with adopted energy conservation plans, it was concluded that the proposed project would create significant adverse indirect conflicts with adopted energy conservation plans in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer indirect impacts from future facilities that have the potential to conflict with adopted energy conservation plans compared to the proposed project.

Based upon the above information, potential indirect impacts from future facilities that have the potential to conflict with adopted energy conservation plans as a result of

implementing Alternative C would be significant, but less than the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts to adopted energy conservation plans from Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Create a Need for New Power or Utility Systems

The survey of CEQA documents to evaluate projects that have the potential to create a need for new power or utility systems from the proposed project identified no primary facility categories that would create a need for new power or utility systems. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or create significant need in the future for new power or utility systems, it was concluded that the proposed project would create significant adverse indirect impacts in the district from new land use projects increasing the need for new power or utility systems. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or less demand for new power or utility systems compared to the proposed project.

Based upon the above information, potential impacts as a result of increased demand for new power or utility systems from implementing Alternative C would be significant, but less than the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts to from Alternative C as a result of future projects that have the potential to increase the demand for new power or utility systems would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Create a Significant Effect on Energy Supplies

The survey of CEQA documents to evaluate the potential for significant effects on energy supplies from the proposed project identified no primary facility categories that would significantly adversely affect energy supplies. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics that could create significant adverse effects on energy supplies, it was concluded that the proposed project would create significant adverse indirect effects on energy supplies in the district. Because fewer facilities could be built under

Alternative C, Alternative C would generate similar or fewer energy supply impacts compared to the proposed project.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts to energy supplies. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative C. On balance, it is concluded that potential energy supply impacts from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts to energy supplies from Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Comply with Existing Energy Standards

The survey of CEQA documents to evaluate the potential for impacts resulting from future land use projects violating existing energy standards as a result of implementing the proposed project identified no primary facility categories that would create significant adverse indirect impacts through violations of existing energy standards. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be constructed in such a way that could exceed existing energy standards, it was concluded that the proposed project would create significant adverse indirect impacts on existing energy standards in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer indirect impacts from future facilities that have the potential to violate existing energy standards compared to the proposed project.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts in terms of compliance with existing energy standards. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative C. On balance, it is concluded that potential indirect impacts from future facilities that have the potential to violate existing energy standards as a result of implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts from future facilities that have the potential to violate existing energy standards as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying

for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Alternative D - Use of Credits Generated in 2009 and Beyond Only

Conflict with Adopted Conservation Plans

The survey of CEQA documents to evaluate the potential for conflicts with adopted energy conservation plans from the proposed project identified no primary facility categories that would significantly adversely conflict with adopted energy conservation plans. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse conflicts with adopted energy conservation plans, it was concluded that the proposed project would create significant adverse indirect conflicts with adopted energy conservation plans in the district. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of conflicts with adopted conservation plans.

Based upon the above information, indirect impacts from conflicts with adopted energy conservation plans as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from projects that have the potential to conflict with adopted conservation plans, but indirect cumulative plan conflict impacts less than the proposed project.

Create a Need for New Power or Utility Systems

The analysis of potential indirect impacts from future land use projects that have the potential to create a need for new power or utility systems as a result of implementing Alternative D is based on comparing the relative merits of this alternative with the proposed project. The survey of CEQA documents to evaluate projects that have the potential to create a need for new power or utility systems from the proposed project identified no primary facility categories that would create a need for new power or utility

systems. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or create significant need in the future for new power or utility systems, it was concluded that the proposed project would create significant adverse indirect impacts in the district from new land use projects increasing the need for new power or utility systems. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of creating a need for new power or utility systems.

Based upon the above information, indirect impacts from future land use projects that have the potential to create a need for new power or utility systems as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future facilities that have the potential to create the need for new power or utility systems, but indirect cumulative power or utility impacts would be less than the proposed project.

Create a Significant Effect on Energy Supplies

The survey of CEQA documents to evaluate the potential for significant effects on energy supplies from the proposed project identified no primary facility categories that would significantly adversely affect energy supplies. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics that could create significant adverse effects on energy supplies, it was concluded that the proposed project would create significant adverse indirect effects on energy supplies in the district. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of creating a significant effect on energy supplies

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts to energy supplies. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative D. On balance, it is concluded that indirect significant effects on energy supplies as a result of implementing Alternative D are considered to be significant, but less than the proposed project because

fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future facilities that have the potential to create significant effects on energy supplies, but indirect cumulative energy supply impacts would be less than the proposed project.

Comply with Existing Energy Standards

The survey of CEQA documents to evaluate the potential for impacts resulting from future land use projects violating existing energy standards as a result of implementing the proposed project identified no primary facility categories that would create significant adverse indirect impacts through violations of existing energy standards. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be constructed in such a way that could exceed existing energy standards, it was concluded that the proposed project would create significant adverse indirect impacts on existing energy standards in the district. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of compliance with existing energy standards.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts in terms of compliance with existing energy standards. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative D. On balance, it is concluded that indirect impacts from future land use projects violating existing energy standards as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits

generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future facilities that do not comply with existing energy standards, but indirect cumulative energy standards impacts would be less than the proposed project.

Alternative E – Limited Offset Availability

Conflict with Adopted Conservation Plans

The survey of CEQA documents to evaluate the potential for conflicts with adopted energy conservation plans from the proposed project identified no primary facility categories that would significantly adversely conflict with adopted energy conservation plans. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse conflicts with adopted energy conservation plans, it was concluded that the proposed project would create significant adverse indirect conflicts with adopted energy conservation plans in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of conflicts with adopted conservation plans.

Indirect conflict impacts with adopted energy conservation plans in the district from implementing Alternative E would be less than indirect conflict impacts with adopted energy conservation plans in the district from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect conflict impacts with adopted energy conservation plans in the district from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative conflict impacts with adopted energy conservation plans in the district from implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Create a Need for New Power or Utility Systems

The survey of CEQA documents to evaluate projects that have the potential to create a need for new power or utility systems from the proposed project identified no primary facility categories that would create a need for new power or utility systems. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or create significant need in the future for new power or utility systems, it was concluded that the proposed project would create significant adverse indirect impacts in the district from new land use projects increasing the need for new power or utility systems. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of creating a need for new power or utility systems.

Indirect impacts from future facilities that have the potential to create a need for new power or utility systems as a result of implementing Alternative E would be less than indirect power or utility system impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect power or utility system impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to create a need for new power or utility systems as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Create a Significant Effect on Energy Supplies

The survey of CEQA documents to evaluate the potential for significant effects on energy supplies from the proposed project identified no primary facility categories that would significantly adversely affect energy supplies. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics that could create significant adverse effects on energy supplies, it was concluded that the proposed project would create significant adverse indirect effects on energy supplies in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of creating significant effects on energy supplies.

Indirect impacts from future facilities that have the potential to create significant effects on energy supplies as a result of implementing Alternative E would be less than indirect

energy supply impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts to energy supplies. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative E. On balance, it is concluded that indirect energy supply impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to create significant effects on energy supplies as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Comply with Existing Energy Standards

The survey of CEQA documents to evaluate the potential for impacts resulting from future land use projects violating existing energy standards as a result of implementing the proposed project identified no primary facility categories that would create significant adverse indirect impacts through violations of existing energy standards. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be constructed in such a way that could exceed existing energy standards, it was concluded that the proposed project would create significant adverse indirect impacts on existing energy standards in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of complying with existing energy standards.

Indirect impacts from future facilities that have the potential to violate energy standards as a result of implementing Alternative E would be less than indirect energy standard impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts in terms of compliance with existing energy standards. Therefore, environmental impacts may not

be proportional to the number of projects constructed and operated as a result of implementing Alternative E. On balance, it is concluded that indirect energy standard impacts from Alternative E would be significant, but less than compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to violate energy standards as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Geology and Soils

Proposed Project

The NOP/IS prepared for the proposed project indicated that the proposed project has the potential to generate significant adverse geology and soils impacts for the following reasons. Individual projects could occur along active faults and would be subject to hazards posed by surface fault rupture due to seismic activity. During an earthquake on these active or potentially active faults within the district, potential surface rupture of the fault may result in relative displacement of the ground across the fault surface. Individual projects could be located in areas subject to liquefaction and earthquake-induced landslides. Individual projects may also be subject to impacts resulting from subsidence, soil settlement, and expansive and corrosive soils, all of which have the potential to cause damage to building foundations, structures, pavements, and other landscape features.

The analysis in subchapter 5-7 concludes that the proposed project has the potential to significantly adversely affect such resources. Mitigation of geology and soils impacts would be the responsibility of the public agency (e.g., city or county) that would serve as lead agency on any given future project. Since the SCAQMD cannot predict how a future lead agency might choose to mitigate a particular significant environmental impact, the potential exists for future indirect geology and soils impacts to be significant and unavoidable (i.e., significant even after mitigation).

Expose People to Risks from Earthquakes, Liquefaction or Landslides

The survey of the 52 CEQA documents shown in Table 5.7-1 revealed that entertainment/recreational facilities (document #23) and transportation facilities (document #39) have the potential to create significant adverse indirect impacts that could expose people to risks from earthquakes, liquefaction, or landslides. The CEQA documents for the remaining primary facility categories: agricultural facilities; retail/services facilities; large commercial facilities; institutional facilities; utility facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse indirect impacts that could expose people to risks from

earthquakes, liquefaction, or landslides. Based on the results of the CEQA document survey and the possibility that future individual projects in all of these facility categories could be sited in or near a location that could expose people to significant risks from earthquakes, liquefaction, or landslides, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental topic area.

Result in Substantial Soil Erosion

The survey of the 52 CEQA documents shown in Table 5.7-1 revealed that no primary facility categories generated significant adverse indirect impacts that could create substantial soil erosion. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Future individual projects in any of the nine facility categories could generate other changes that could create substantial soil erosion in the future from a variety of facility categories that obtain offsets from the SCAQMD's internal accounts and, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Locate Project on Unstable Soil

The survey of the 52 CEQA documents shown in Table 5.7-1 revealed that transportation facilities (document #39) have the potential to create significant adverse indirect impacts that could expose people to risks from earthquakes, liquefaction, or landslides. The CEQA documents for the remaining primary facility categories: agricultural facilities; retail/services facilities; large commercial facilities; entertainment/recreational facilities; institutional facilities; utility facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse indirect impacts from locating projects on unstable soils, resulting in landslides or liquefaction. Based on the results of the CEQA document survey and the possibility that future individual projects in any of these facility categories could be sited in or near a location that consists of unstable soils, resulting in landslides or liquefaction, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental topic area.

Locate Project on Expansive Soil

The survey of the 52 CEQA documents shown in Table 5.7-1 revealed that no primary facility categories generated significant adverse indirect impacts that could result in future facilities being located on expansive soil. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in any of the nine facility categories could generate other changes that could result in facilities being located on

expansive soil in the future from a variety of facility categories that obtain offsets from the SCAQMD's internal account and, using an abundance of caution, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Project Incapable of Supporting Use of Septic Tanks/Alternative Wastewater Systems

The survey of the 52 CEQA documents shown in Table 5.7-1 revealed that no primary facility categories generated significant adverse indirect impacts from facilities that have the potential to use septic tanks in areas incapable of supporting their use or use alternative wastewater systems. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in any of the nine facility categories could generate other changes that could result in the use of septic tanks in areas incapable of supporting their use or the use of alternative wastewater systems from a variety of facility categories that obtain offsets from the SCAQMD's internal account and, using an abundance of caution, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Cumulative Impacts

Project impacts to geology and soils could combine with impacts from other past, present and future projects, including projects permitted under SB 827, projects permitted in reliance on ERC's and new power plants entitled to receive offsets pursuant to state law. It is concluded that the proposed project would make a cumulatively considerable contribution to significant cumulative impacts to geology and soils.

Alternative A - No Project Alternative

Expose People to Risks from Earthquakes, Liquefaction or Landslides

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future projects that have the potential to expose people to risks from earthquakes, liquefaction or landslides are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, there would be no future projects that have the potential to expose people to risks from earthquakes, liquefaction or landslides when compared against the proposed project, so under the No Project Alternative potential future impacts from projects that have the potential to expose people to risks from earthquakes, liquefaction or landslides would not be significant when compared to the proposed project.

Result in Substantial Soil Erosion

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future projects that have the potential to result in substantial soil erosion are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, there would be no future projects that have the potential to result in substantial soil erosion when compared against the proposed project, so under the No Project Alternative potential future impacts from future projects that have the potential to result in substantial soil erosion would not be significant when compared to the proposed project.

Locate Project on Unstable Soil

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state

legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future projects that could be located on unstable soils are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012 no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that would be located on unstable soil compared to the proposed project. Overall, under the No Project Alternative potential future indirect impacts from locating projects on unstable soils could occur, would be significant, but would be less than the significance determination for the proposed project.

Locate Project on Expansive Soil

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to be located on expansive soils are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, there would be no future facilities that have the potential to be located on expansive soils when compared against the proposed project, so under the No Project Alternative potential future impacts from future facilities that have the potential to be located on expansive soils would not be significant when compared to the proposed project.

Project Incapable of Supporting Use of Septic Tanks/Alternative Waste Water Systems

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities incapable of supporting the use of septic tanks or alternative waste water systems are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, there would be no future facilities incapable of supporting the use of septic tanks or alternative waste water systems when compared against the proposed project, so under the No Project Alternative potential future impacts from future facilities incapable of supporting the use of septic tanks or alternative waste water systems would not be significant when compared to the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that are incapable of supporting the use of septic tanks or alternative waste water systems are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. . Therefore, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that would be located in areas unable to support the use of septic tanks or alternative wastewater systems compared to the proposed project. Overall, under the No Project Alternative potential future indirect impacts from locating projects in areas unable to support the use of septic tanks or alternative wastewater systems would be significant, but would be less than the significance determination for the proposed project.

Alternative B – Offset User Fees for Large Businesses

Expose People to Risks from Earthquakes, Liquefaction or Landslides

The survey of CEQA documents to evaluate the potential for risk impacts from exposing people to earthquakes, liquefaction, or landslides the proposed project identified the following primary facility category that would create significant adverse indirect impacts from exposing people to earthquakes, liquefaction, or landslides: entertainment/recreational facilities, and transportation facilities. For this reason and the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exposing people to earthquakes, liquefaction, or landslides, it was concluded that the proposed project would create significant adverse indirect impacts in the district from future land use projects that could expose people to earthquakes, liquefaction, or landslides.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to expose people to risks from earthquakes, etc., compared to the proposed project. In addition, a number of emission reduction projects could be located in or near areas that could expose people to risks from earthquakes, liquefaction, or landslides. Such projects include, but are not limited to anaerobic digesters, liquefied natural gas fueling stations.

As a result, indirect future risks from Alternative B from exposing people to earthquakes, liquefaction, or landslides are considered to be equivalent to or greater than the proposed project. The contribution to cumulative impacts from future Alternative B projects that have the potential to expose people to risks from earthquakes, liquefaction, or landslides is expected to be greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Result in Substantial Soil Erosion

The survey of CEQA documents to evaluate the potential for impacts from future land use projects that could result in substantial soil erosion from the proposed project identified no primary facility categories that would significantly adversely affect soil erosion from future land use projects. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse soil erosion impacts, it was concluded that the proposed project would create significant adverse indirect soil erosion impacts.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect soil erosion impacts compared to the proposed project. In addition, a number of future emission reduction projects could require substantial site modifications that have the potential to generate indirect soil erosion impacts. In addition, emission reduction projects could have such impacts. Such projects include, but are not limited to anaerobic digesters, and liquefied natural gas fueling stations.

As a result, indirect future soil erosion impacts from implementing Alternative B are considered to be equivalent to or greater than the proposed project. The contribution to cumulative soil erosion impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Locate Project on Unstable Soil

The survey of CEQA documents to evaluate the potential for adverse indirect impacts from locating future land use projects on unstable soils from the proposed project identified one primary facility category, transportation facilities, that would create significant adverse indirect impacts from locating projects on unstable soils. For this reason and the possibility that future individual projects in this and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from locating future land use projects on unstable soils, it was concluded that the proposed project would create significant adverse indirect impacts as a result of building land use in the district on unstable soils.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to be located on unstable soils compared to the proposed project.

As a result, indirect future impacts from Alternative B from locating projects on unstable soils are considered to be equivalent to or greater than the proposed project. The contribution to cumulative unstable soil impacts from Alternative B are expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Locate Project on Expansive Soil

The survey of CEQA documents to evaluate the potential impacts from future projects located on expansive soil from the proposed project identified no primary facility categories that would be located on expansive soil. However, because of the possibility

that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects located on expansive soil, it was concluded that the proposed project would create significant adverse indirect impacts from future projects located on expansive soil in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to be located on expansive soils compared to the proposed project. Such projects include, but are not limited to: anaerobic digesters and liquefied natural gas fueling stations.

As a result, indirect future impacts from Alternative B from locating projects on expansive soils are considered to be equivalent to or greater than the proposed project. The contribution to cumulative expansive soil impacts from Alternative B are expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Project Incapable of Supporting Use of Septic Tanks/Alternative Waste Water Systems

The survey of CEQA documents to evaluate the potential impacts from future projects incapable of supporting the use of septic tanks or alternative waste water systems from the proposed project identified no primary facility categories that would be incapable of supporting the use of septic tanks or alternative waste water systems. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects incapable of supporting the use of septic tanks or alternative waste water systems, it was concluded that Alternative B would create significant adverse indirect impacts from future projects incapable of supporting the use of septic tanks or alternative waste water systems in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to be located in areas incapable of supporting alternative wastewater systems compared to the proposed project. For example, a number of emission reduction projects could be located in or near areas that could expose people to risks from earthquakes, liquefaction, or landslides. Such projects include, but are not limited to anaerobic digesters and liquefied natural gas fueling stations.

As a result, indirect future impacts from Alternative B from locating projects in areas incapable of supporting the use of septic tanks or alternative waste water disposal systems are considered to be equivalent to or greater than the proposed project. The

contribution to cumulative impacts from future Alternative B projects incapable of supporting the use of septic tanks or alternative wastewater disposal systems are expected to be greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Alternative C –Large Businesses Prohibited from Accessing Rule 1304 Exemptions

Expose People to Risks from Earthquakes, Liquefaction or Landslides

The survey of CEQA documents to evaluate the potential for risk impacts from exposing people to earthquakes, liquefaction, or landslides the proposed project identified the following primary facility categories that would create significant adverse indirect impacts from exposing people to earthquakes, liquefaction, or landslides: entertainment/recreational facilities, and transportation facilities. For this reason and the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exposing people to earthquakes, liquefaction, or landslides, it was concluded that the proposed project would create significant adverse indirect impacts in the district from future land use projects that could expose people to earthquakes, liquefaction, or landslides. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer impacts as a result of future affected facilities exposing people to risks from earthquakes, liquefaction, or landslides compared to the proposed project.

Based upon the above information, potentially significant impacts as a result of future affected facilities exposing people to risks from earthquakes, liquefaction, or landslides from implementing Alternative C would be significant, but less than the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts as a result of future affected facilities exposing people to risks from earthquakes, liquefaction, or landslides from implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Result in Substantial Soil Erosion

The survey of CEQA documents to evaluate the potential for impacts from future land use projects that could result in substantial soil erosion from the proposed project identified no primary facility categories that would significantly adversely affect soil erosion from future land use projects. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse soil erosion impacts, it was concluded that Alternative C would create significant adverse indirect soil erosion impacts in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer soil erosion impacts compared to the proposed project.

Based upon the above information, there would be significant, but fewer or less significant potential soil erosion impacts from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect soil erosion impacts from implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Locate Project on Unstable Soil

The survey of CEQA documents to evaluate the potential for adverse indirect impacts from locating future land use projects on unstable soils from the proposed project identified one primary facility category, transportation facilities, that would create significant adverse indirect impacts from locating projects on unstable soils. For this reason and the possibility that future individual projects in this and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from locating future land use projects on unstable soils, it was concluded that the proposed project would create significant adverse indirect impacts as a result of building land use in the district on unstable soils. Because fewer facilities could be built under Alternative C, Alternative C would result in the same or fewer number of projects located on unstable soils compared to the proposed project.

Based upon the above information, there would be significant, but fewer or less significant potential impacts from locating future affected facilities on unstable soils as a result of implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts from implementing Alternative C as a result of locating them on unstable soils would be

significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Locate Project on Expansive Soil

The survey of CEQA documents to evaluate the potential impacts from future projects located on expansive soil from the proposed project identified no primary facility categories that would be located on expansive soil. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects located on expansive soil, it was concluded that the proposed project would create significant adverse indirect impacts from future projects located on expansive soils in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer impacts resulting from the construction of future affected facilities on expansive soils compared to the proposed project.

Based upon the above information, there would be significant, but fewer or less significant potential impacts resulting from the construction of future affected facilities on expansive soils as a result of implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts of locating future affected facilities on expansive soils from implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Project Incapable of Supporting Use of Septic Tanks/Alternative Waste Water Systems

The survey of CEQA documents to evaluate the potential impacts from future projects incapable of supporting the use of septic tanks or alternative waste water systems from the proposed project identified no primary facility categories that would be incapable of supporting the use of septic tanks or alternative waste water systems. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects incapable of supporting the use of septic tanks or alternative waste water systems, it was concluded that the proposed project would create significant adverse indirect impacts from future projects incapable of supporting the use of septic tanks or alternative waste water systems in the district.

Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer impacts as a result of constructing future affected facilities in areas incapable of supporting the use of septic tanks or alternative wastewater disposal systems compared to the proposed project.

Based upon the above information, there would be significant, but fewer or less significant potential impacts as a result of constructing future affected facilities in areas incapable of supporting the use of septic tanks or alternative wastewater disposal systems from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts to from Alternative C as a result of constructing future affected facilities in areas incapable of supporting the use of septic tanks or alternative wastewater disposal systems would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Alternative D - Use of Credits Generated in 2009 and Beyond Only

Expose People to Risks from Earthquakes, Liquefaction or Landslides

The survey of CEQA documents to evaluate the potential for risk impacts from exposing people to earthquakes, liquefaction, or landslides the proposed project identified the following primary facility category that would create significant adverse indirect impacts from exposing people to earthquakes, liquefaction, or landslides: entertainment/recreational facilities, and transportation facilities. For this reason and the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exposing people to earthquakes, liquefaction, or landslides, it was concluded that the proposed project would create significant adverse indirect impacts in the district from future land use projects that could expose people to earthquakes, liquefaction, or landslides. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of exposing people to risks from earthquakes, liquefaction, or landslides.

Based upon the above information, indirect impacts from exposing people to earthquakes, liquefaction, or landslides as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets is expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts

from Alternative D are expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from projects that have the potential to expose people to risks from earthquakes, liquefaction, or landslides, but indirect cumulative exposure impacts would be less than the proposed project.

Result in Substantial Soil Erosion

The survey of CEQA documents to evaluate the potential for impacts from future land use projects that could result in substantial soil erosion from the proposed project identified no primary facility categories that would significantly adversely affect soil erosion from future land use projects. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse soil erosion impacts, it was concluded that the proposed project would create significant adverse indirect soil erosion impacts. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of soil erosion.

Based upon the above information, indirect impacts from construction future land use projects that could result in substantial soil erosion during site preparation as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative soil erosion impacts, but indirect cumulative soil erosion impacts would be less than the proposed project.

Locate Project on Unstable Soil

The survey of CEQA documents to evaluate the potential for adverse indirect impacts from locating future land use projects on unstable soils from the proposed project identified one primary facility category, transportation facilities, that would create significant adverse indirect impacts from locating projects on unstable soils. For this reason and the possibility that future individual projects in this and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from locating future land use projects on unstable soils, it was concluded that the proposed project would create significant adverse indirect impacts as a result of building land use in the district on unstable soils. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of locating projects on unstable soil.

Based upon the above information, indirect impacts from locating future land use projects on unstable soils as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from locating future projects on unstable soils, but indirect cumulative unstable soils impacts would be less than the proposed project.

Locate Project on Expansive Soil

The survey of CEQA documents to evaluate the potential impacts from future projects located on expansive soil from the proposed project identified no primary facility categories that would be located on expansive soil. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects located on expansive soil, it was concluded that the proposed project would create significant adverse indirect impacts from future projects located on expansive soil. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of locating projects on expansive soil.

Based upon the above information, indirect impacts from future projects located on expansive soil as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts as a result of locating future projects on expansive soils, but indirect cumulative expansive soil impacts would be less than the proposed project.

Project Incapable of Supporting Use of Septic Tanks/Alternative Waste Water Systems

The survey of CEQA documents to evaluate the potential impacts from future projects incapable of supporting the use of septic tanks or alternative waste water systems from the proposed project identified no primary facility categories that would be incapable of supporting the use of septic tanks or alternative waste water systems. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects incapable of supporting the use of septic tanks or alternative waste water systems, it was concluded that the proposed project would create significant adverse indirect impacts from future projects incapable of supporting the use of septic tanks or alternative waste water systems. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of septic tanks and alternative wastewater systems.

Based upon the above information, indirect impacts from future projects incapable of supporting the use of septic tanks or alternative waste water systems as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further,

only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts as a result of locating future projects in areas incapable of supporting septic tanks or alternative waste water disposal systems, but indirect cumulative wastewater disposal impacts would be less than the proposed project.

Alternative E – Limited Offset Availability

Expose People to Risks from Earthquakes, Liquefaction or Landslides

The survey of CEQA documents to evaluate the potential for risk impacts from exposing people to earthquakes, liquefaction, or landslides the proposed project identified the following primary facility category that would create significant adverse indirect impacts from exposing people to earthquakes, liquefaction, or landslides: entertainment/recreational facilities, and transportation facilities. For this reason and the possibility that future individual projects in these and other primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exposing people to earthquakes, liquefaction, or landslides, it was concluded that the proposed project would create significant adverse indirect impacts in the district from future land use projects that could expose people to earthquakes, liquefaction, or landslides. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of exposure to risks from earthquakes, liquefaction or landslides.

Indirect impacts from future facilities that have the potential to expose people to risks from earthquakes, liquefaction or landslides as a result of implementing Alternative E would be less than indirect earthquake, liquefaction, or landslide impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect earthquake, liquefaction, or landslide impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative future facilities that have the potential to expose people to risks from earthquakes, liquefaction or landslides as a result of impacts from implementing Alternative E would be significant, but less than the

proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Result in Substantial Soil Erosion

The survey of CEQA documents to evaluate the potential for impacts from future land use projects that could result in substantial soil erosion from the proposed project identified no primary facility categories that would significantly adversely affect soil erosion from future land use projects. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse soil erosion impacts, it was concluded that the proposed project would create significant adverse indirect soil erosion impacts. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of results in substantial soil erosion.

Indirect soil erosion impacts from implementing Alternative E would be less than indirect soil erosion impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect soil erosion impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative soil erosion impacts from implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Locate Project on Unstable Soil

The survey of CEQA documents to evaluate the potential for adverse indirect impacts from locating future land use projects on unstable soils from the proposed project identified one primary facility category, transportation facilities, that would create significant adverse indirect impacts from locating projects on unstable soils. For this reason and the possibility that future individual projects in this and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from locating future land use projects on unstable soils, it was concluded that the proposed project would create significant adverse indirect impacts as a result of building affected facilities in the district on

unstable soils. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of locating projects on unstable soil.

Indirect soil impacts from locating future facilities on unstable soils as a result of implementing Alternative E would be less than indirect unstable soil impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect unstable soil impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from locating future facilities on unstable soils as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Locate Project on Expansive Soil

The survey of CEQA documents to evaluate the potential impacts from future projects located on expansive soil from the proposed project identified no primary facility categories that would be located on expansive soil. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects located on expansive soil, it was concluded that the proposed project would create significant adverse indirect impacts from future projects located on expansive soil. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of locating projects on expansive soil.

Indirect impacts from locating future facilities on expansive soils as a result of implementing Alternative E would be less than indirect expansive soils impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect expansive soils impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from locating future facilities on expansive soils

as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Project Incapable of Supporting Use of Septic Tanks/Alternative Wastewater Systems

The survey of CEQA documents to evaluate the potential impacts from future projects incapable of supporting the use of septic tanks or alternative waste water systems from the proposed project identified no primary facility categories that would be incapable of supporting the use of septic tanks or alternative waste water systems. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects incapable of supporting the use of septic tanks or alternative waste water systems, it was concluded that the proposed project would create significant adverse indirect impacts from future projects incapable of supporting the use of septic tanks or alternative waste water systems. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of septic tanks and alternative wastewater systems.

Indirect impacts from future facilities that have the potential to be located in areas incapable of supporting alternative wastewater systems as a result of implementing Alternative E would be less than indirect alternative wastewater system impacts from the proposed project because fewer representative facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If debit demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect alternative wastewater systems impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to be located in areas incapable of supporting alternative wastewater systems as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Hazards and Hazardous Materials

Proposed Project

The NOP/IS prepared for the proposed project indicated that it has the potential to generate significant adverse hazards and hazardous materials impacts for the following

reasons. Impacts could result from exposure of persons or the environment to hazardous materials through activities that could include, but not be limited to, excavation of underground materials; accidental release of hazardous materials during transport, use, or storage; or leaking tanks.

Subchapter 5.8 concluded that the proposed project has the potential to create significant adverse impacts. Mitigation of hazards and hazardous materials impacts would be the responsibility of the public agency (e.g., city or county) that would serve as lead agency on any given future project. Since the SCAQMD cannot predict how a future lead agency might choose to mitigate a particular significant hazard and hazardous materials impact, the potential exists for future indirect impacts to be significant and unavoidable (i.e., significant even after mitigation).

Create a Hazard through Transport, Use, or Disposal of Hazardous Materials

The survey of the 52 CEQA documents shown in Table 5.8-1 revealed that utility facilities (document #43) have the potential to create significant adverse indirect impacts from transport, use, or disposal of hazardous materials. The CEQA documents for the remaining primary facility categories: agricultural facilities; retail/services facilities; large commercial facilities; entertainment/recreational facilities; institutional facilities; transportation facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse indirect impacts from transport, use, or disposal of hazardous materials. Based on the results of the CEQA document survey and the possibility that future individual projects in all of these facility categories could transport, use, or dispose of hazardous materials, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental topic area.

Create a Hazard through Upset/Accident Conditions

The survey of the 52 CEQA documents shown in Table 5.8-1 revealed that utility facilities (document #43) have the potential to create significant adverse hazard impacts through upset or accident conditions. The CEQA documents for the remaining primary facility categories: agricultural facilities; retail/services facilities; large commercial facilities; entertainment/recreational facilities; institutional facilities; transportation facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse hazard impacts through upset or accident conditions. Based on the results of the CEQA document survey and the possibility that future individual projects in all of these facility categories could create hazard impacts through upset or accident conditions, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental topic area.

Emit Hazardous Emissions or Material within One-quarter Mile of a Nearby School

The survey of the 52 CEQA documents shown in Table 5.8-1 revealed that no facilities in any of the primary facility categories generated significant adverse indirect impacts that have the potential to emit hazardous emissions or material within one-quarter mile of a nearby school. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in all of the nine facility categories could generate other changes resulting in future facilities that have the potential to emit hazardous emissions or material within one-quarter mile of a nearby school, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Located on a Hazardous Material Site (Government Code §65962.5)

The survey of the 52 CEQA documents shown in Table 5.8-1 revealed that no primary facility categories generated significant adverse indirect impacts from facilities locating on a hazardous material site. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in all of the nine facility categories could generate other changes that could result in facilities locating on hazardous material, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Located within Airport Land Use Plan or within Two Miles of an Airport

The survey of the 52 CEQA documents shown in Table 5.8-1 revealed that no primary facility categories generated significant adverse hazard impacts from facilities that locate within an airport land use plan or within two miles of an airport. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in all of the nine facility categories could generate other changes that could result in future facilities that obtain offsets from the SCAQMD's internal account locating within an airport land use plan or within two miles of an airport, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Located within the Vicinity of a Private Airstrip

The survey of the 52 CEQA documents shown in Table 5.8-1 revealed that no primary facility categories generated significant adverse hazard impacts from facilities that locate

within the vicinity of a private airstrip. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in all of the nine facility categories could generate other changes that could result in hazard impacts from facilities obtaining offsets from the SCAQMD's internal account and locating within the vicinity of a private airstrip and, using an abundance of caution, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Interfere with Adopted Emergency Response Plans

The survey of the 52 CEQA documents shown in Table 5.8-1 revealed that no primary facility categories had the potential to interfere with adopted emergency response plans. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in all of the nine facility categories could generate other changes resulting in siting future facilities in locations that could interfere with adopted emergency response plans, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Expose People to Risk from Wildland Fires

The survey of the 52 CEQA documents shown in Table 5.8-1 revealed that no primary facility categories exposed people to risks from wildland fires. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in all of the nine facility categories could generate other changes that could result in exposing people to risks from wildland fires from a variety of facility categories that obtain offsets from the SCAQMD's internal account and, using an abundance of caution, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Increase Fire Hazards from Flammable Materials

The survey of the 52 CEQA documents shown in Table 5.8-1 revealed that no primary facility categories increased fire hazards from flammable materials. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in all of the nine facility categories could generate other changes that could result in an increase in fire hazards from flammable materials from a variety of facility categories that obtain offsets from the SCAQMD's internal account, the analysis concluded that the proposed project

has the potential to create significant adverse indirect impacts to this environmental category.

Cumulative Impacts

Project impacts with respect to hazards and hazardous materials could combine with impacts from other past, present and future projects, including projects permitted under SB 827, projects permitted in reliance on ERC's and new power plants entitled to receive offsets pursuant to state law. It is concluded that the proposed project would make a cumulatively considerable contribution to significant cumulative impacts with respect to hazards and hazardous materials.

Alternative A - No Project Alternative

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 is in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts.

Under the No Project Alternative, it is assumed that facilities that previously relied on access to the SCAQMD's internal accounts in the past to demonstrate equivalency with federal offset requirements, through either Rule 1304 or Rule 1309.1, would no longer have access to those offsets after May 1, 2012, when applying for a permit for new or modified equipment. As a result, the analysis in this PEA assumes that no facilities that previously obtained credits pursuant to Rules 1304 or 1309.1 would be built.

The inability to approve permits for future facilities that previously would have accessed the SCAQMD's internal accounts would result in existing facilities' inability to replace existing equipment beyond its useful lifetime or install new equipment to further accommodate population growth. Similarly, new facilities could not be constructed.

Create a Hazard through Transport, Use, or Disposal of Hazardous Materials

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to increase hazards through transport, use or disposal of hazardous materials are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012 no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that could increase have the potential to increase hazards through transport, use or disposal of hazardous materials when compared to the proposed project.

Under the No Project Alternative after May 1, 2012, existing equipment would be expected to operate indefinitely into the future without replacement or modification because of the permit moratorium. Since most equipment has a useful lifetime duration, at some point in the future existing equipment would be expected to experience breakdowns and other types of failures that could cause accidental releases of hazardous materials, especially equipment that has already been in operation for a number of years. For example, most of the existing refineries in the district have equipment that has been operating for decades and, as such, may experience accidental releases of petroleum products or hazardous materials from aging storage tanks, process equipment, etc. Similarly, chemical manufacturing facilities may experience accidental releases of hazardous materials from old operating equipment where valves, and flanges, experience leaks from corrosion, rust, or other destructive influences. Such hazardous materials would need to be contained and transported from the release site to an appropriate disposal or handling facility.

In addition to the increased potential for accidental releases of hazardous materials from aging equipment that cannot be replaced or modified, the No Project Alternative also has the potential to delay or otherwise impede remediation efforts at contaminated sites. As can be seen in Appendix H, under the permit moratorium that temporarily ended as of January 1, 2010, there were a number of pending permit applications for equipment such as thermal oxidizers or vapor extraction that would be used to remediate soils contaminated with gasoline or other petroleum products. Similarly, there was a number of pending permit applications for equipment such as thermal or catalytic oxidizers or vapor extraction that would be used to clean up contaminated groundwater. Without approval of pending or future permits used to remediate contaminated soil or groundwater, remediation efforts could be substantially delayed until such time as currently permitted equipment is available for future remediation projects.

As time goes by it is expected that increase hazards through transport, use or disposal of hazardous materials could potentially increase. Consequently, under the No Project Alternative, new indirect fire hazards resulting from aging combustion equipment are considered to be significant and greater than the impacts of the proposed project.

Create a Hazard through Upset/Accident Conditions

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to create a hazard through upset or accident conditions are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either through Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that could create new indirect hazards through upset or accident conditions when compared to the proposed project.

Under the No Project Alternative after May 1, 2012, existing equipment would be expected to operate indefinitely into the future without replacement or modification because of the permit moratorium. Since most equipment has a useful lifetime duration, at some point in the future existing equipment would be expected to experience breakdowns and other types of failures that could create hazards through upset or accident conditions from the release of hazardous materials, especially equipment that has already been in operation for a number of years. For example, most of the existing refineries in the district have equipment that has been operating for decades and, as such, may experience accidental releases of hazardous materials from aging storage tanks, process equipment, etc. Similarly, chemical manufacturing facilities may experience accidental releases of hazardous materials from old operating equipment where valves, flanges, etc., experience leaks from corrosion, rust, or other influences.

Another potential indirect hazard impact is associated with installation of backup flares, which require permits from the SCAQMD. Under certain circumstances, flares are considered safety equipment. For example, in the event of dangerous increases in pressure in some refinery operations, excess gases and vapors may be vented to an emergency backup flare to prevent explosions. Similarly, flares used at essential public services, including landfills and sewage treatment facilities, can also be used in an emergency backup capacity to prevent explosions if other types of equipment, e.g., gas turbines, internal combustion engines, boilers, etc., are used as the primary control

equipment. As indicated in Appendix H there were permit applications for backup flares, two at landfills and two at sewage treatment facilities.

As time goes by it is expected that the probability of accidental releases of hazardous materials could potentially increase. Consequently, under the No Project Alternative, new indirect hazards from accident or upset conditions resulting from aging combustion equipment are considered to be significant and greater than the impacts of the proposed project.

Emit Hazardous Emissions or Material within One-quarter Mile of a Nearby School

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to emit hazardous emissions or material within one-quarter mile of a nearby school are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that could create new indirect hazardous emissions or material impacts within one-quarter mile of a nearby school when compared to the proposed project.

After May 1, 2012, existing equipment would be expected to operate indefinitely into the future without replacement or modification because of the permit moratorium. Since most equipment has a useful lifetime duration, at some point in the future existing equipment would be expected to experience breakdowns and other types of failures that could cause accidental releases of hazardous materials within one-quarter mile of a school, especially equipment that has already been in operation for a number of years. For example, some industrial facilities in the district have equipment that has been operating for decades and, as such, may experience accidental releases of chemical products of other hazardous materials from aging storage tanks, process equipment, etc. For example, chemical manufacturing facilities may experience accidental releases of hazardous materials from old operating equipment where valves, flanges, etc.,

experience leaks from corrosion, rust, or other influences. It is possible that some of these types of facilities could be located within one-quarter mile of a nearby school.

As time goes by it is expected that the probability of accidental releases of hazardous materials from existing sources located within one-quarter mile of school could potentially increase. Consequently, under the No Project Alternative, new indirect hazardous emissions or material impacts within one-quarter mile of a nearby school are considered to be significant.

Located on a Hazardous Material Site (Government Code §65962.5)

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to be located on a hazardous materials site are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either through Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that would be located on a hazardous material site when compared against the proposed project. As a result, under the No Project Alternative potential impacts from future projects constructed and operated in the district as a result of being located on a hazardous material site would not be expected to occur after May 1, 2012, would not be significant, and would be less than the significance determination for the proposed project.

Located within an Airport Land Use Plan or within Two Miles of an Airport

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It

should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to be located within an airport land use plan or within two miles of an airport are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either through Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that would be located within an airport land use plan or within two miles of an airport when compared against the proposed project. As a result, under the No Project Alternative potential impacts from future projects constructed and operated in the district as a result of being located within an airport land use plan or within two miles of an airport would not be expected to occur after May 1, 2012, would not be significant, and would be less than the significance determination for the proposed project.

Located within the Vicinity of a Private Airstrip

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that are located within the vicinity of a private airstrip are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either through Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that would be located within the vicinity of a private airstrip when compared against the proposed project. As a result, under the No Project Alternative potential impacts from future projects constructed and operated in the district as a result of being located within the vicinity of a private airstrip

would not be expected to occur after May 1, 2012, would not be significant, and would be less than the significance determination for the proposed project.

Interfere with Adopted Emergency Plans

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future projects that have the potential to interfere with adopted emergency response plans are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, there would be no facilities that have the potential to interfere with adopted emergency response plans when compared against the proposed project, so under the No Project Alternative potential future impacts from facilities that have the potential to interfere with adopted emergency response plans would not be significant when compared to the proposed project.

Expose People to Risk from Wildland Fires

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to expose people to risk from wildland fires are considered to be significant. Starting May 1, 2012, future facilities that would have

had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012 no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district in areas that could expose people to risks from wildland fires when compared against the proposed project. As a result, under the No Project Alternative potential impacts from future projects constructed and operated in areas of the district that could expose people to risks from wildland fires would not be expected to occur after May 1, 2012, would not be significant, and would be less than the significance determination for the proposed project.

Increase Fire Hazards from Flammable Materials

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to increase fire hazards from flammable materials are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012 no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that could increase fire hazards from flammable materials when compared to the proposed project.

Under the No Project Alternative after May 1, 2012, existing equipment would be expected to operate indefinitely into the future without replacement or modification because of the permit moratorium. Since most equipment has a useful lifetime duration, at some point in the future existing equipment would be expected to experience breakdowns and other types of failures that could increase indirect fire hazards from flammable materials, especially equipment that has already been in operation for a number of years. For example, most of the existing refineries in the district have equipment that has been operating for decades and, as such, may experience accidental fires from combustion sources such as boilers, gas turbines, etc. For example, pending permit applications in Appendix H show that one refinery is proposing to replace two older high emitting and potentially increasingly unsafe cogeneration units and four

boilers with new, state-of-the-art equipment that are more efficient, have substantially lower emissions, and are inherently safer.

Another potential indirect flammability impact is associated with installation of backup flares, which require permits from the SCAQMD. Under certain circumstances, flares are considered safety equipment. For example, in the event of dangerous increases in pressure in some refinery operations, excess gases and vapors may be vented to an emergency backup flare to prevent explosions and fires. Similarly, flares used as a means of controlling emissions at essential public services, including landfills and sewage treatment facilities, can also be used in an emergency backup capacity to prevent explosions or fires if other types of equipment, e.g., gas turbines, internal combustion engines, boilers, etc., are used as the primary control equipment. As indicated in Appendix H there were four permit applications for backup flares, two at landfills and two at sewage treatment facilities.

As time goes by it is expected that the probability of accidents involving combustion sources could potentially increase. Consequently, under the No Project Alternative, new indirect fire hazards resulting from aging combustion equipment are considered to be significant.

Alternative B – Offset User Fees for Large Businesses

Create a Hazard through Transport, Use, or Disposal of Hazardous Materials

The survey of CEQA documents to evaluate the potential hazard impacts through transport, use, or disposal of hazardous materials from the proposed project identified one primary facility category, utility projects, that would create significant adverse hazard impacts through transport, use, or disposal of hazardous materials. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts through transport, use, or disposal of hazardous materials, it was concluded that the proposed project would create significant adverse indirect hazard impacts through transport, use, or disposal of hazardous materials in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to create hazards through transport, use or disposal of hazardous materials compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. Although many emission reduction projects do not involve the use of hazardous materials that could create hazards through transport, use or disposal of such materials (e.g., product reformulation to less or non-hazardous materials), some emission

reduction projects do involve hazardous materials. For example, one emission reduction project would involve installation of new alternative fuel refueling stations. Other emission reduction projects involve replacing one type of fuel, e.g., diesel, with other types of alternative clean fuels, and fuel cells that contain phosphoric acid.

Because future individual projects in the primary facility categories could have unique characteristics and/or include the transport, use, or handling of hazardous materials, it is concluded that Alternative B would create significant adverse indirect hazard impacts. However, because emission reduction projects in the future have the potential to generate both beneficial and adverse hazard impacts, potential indirect hazard impacts from implementing Alternative B are considered to be approximately equivalent to the proposed project. The contribution to cumulative hazard impacts from Alternative B through the transport, use, or disposal of hazardous materials from Alternative B is expected to be significant and approximately equivalent to the cumulative hazard impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Create a Hazard through Upset/Accident Conditions

The survey of CEQA documents to evaluate the potential for hazard impacts created through upset or accident conditions from the proposed project identified one primary facility category, utility projects, that would significantly adversely affect hazard impacts created through upset or accident conditions. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts created through upset or accident conditions, it was concluded that the proposed project would create significant adverse indirect hazard impacts created through upset or accident conditions in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to create hazards through upset or accidents resulting in the release of hazardous materials compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. Although many emission reduction projects do not involve the use of hazardous materials that could create upset or accident conditions (e.g., product reformulation to less or non-hazardous materials), some emission reduction projects do involve hazardous materials that could be released in the event of upset or accident conditions. For example, one emission reduction project would involve installation of new alternative fuel refueling stations. Other emission reduction projects involve replacing one type of fuel, e.g., diesel, with other types of alternative clean fuels and fuel cells that contain phosphoric acid.

Because future individual projects in the primary facility categories could have unique characteristics and/or include the use of hazardous materials that could create upset or accident conditions, it is concluded that Alternative B would create significant adverse indirect hazard impacts. However, because emission reduction projects in the future have the potential to generate both beneficial and adverse hazard impacts, potential indirect hazard impacts from implementing Alternative B are considered to be approximately equivalent to the proposed project. The contribution to cumulative hazard impacts from Alternative B through upset or accident conditions from the release of hazardous materials from Alternative B is expected to be significant and greater than cumulative hazard impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Emit Hazardous Emissions or Material within One-quarter Mile of a Nearby School

The survey of CEQA documents to evaluate the potential hazard impacts from the emission of hazardous emission or material within one-quarter mile of a nearby school from the proposed project identified no primary facility categories that would significantly emit hazardous emission or material within one-quarter mile of a nearby school. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts from the emission of hazardous emission or material within one-quarter mile of a nearby school, it was concluded that the proposed project would create significant adverse indirect hazard impacts from the emission of hazardous emission or material within one-quarter mile of a nearby school in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect hazardous emissions impacts within one-quarter mile of a nearby school compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. Generally, potential emission reduction projects are expected to reduce hazardous air pollutants as a co-benefit of reduction criteria pollutant emissions. Further, although many emission reduction projects do not involve the use of hazardous materials (e.g., product reformulation to less or non-hazardous materials), some emission reduction projects do involve hazardous materials. For example, one emission reduction project would involve installation of new alternative fuel refueling stations. Other emission reduction projects involve replacing one type of fuel, e.g., diesel, with other types of alternative clean fuels and fuel cells that contain phosphoric acid.

Because future individual projects in the primary facility categories could have unique characteristics and/or include the use of hazardous materials, it is concluded that

Alternative B would create significant adverse indirect hazard impacts if located within one-quarter mile of a school. However, because emission reduction projects in the future have the potential to generate both beneficial and adverse hazard impacts, potential indirect hazard impacts from implementing Alternative B are considered to be approximately equivalent to the proposed project. The contribution of cumulative impacts from future Alternative B facilities that have the potential to emit hazardous emissions within one-quarter mile of a nearby school is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Located on a Hazardous Material Site (Government Code §65962.5)

The survey of CEQA documents to evaluate the potential hazard impacts from future projects located on a hazardous material site from the proposed project identified no primary facility categories that would be located on a hazardous material site. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts from future projects located on a hazardous material site, it was concluded that the proposed project would create significant adverse indirect hazard impacts from future projects located on a hazardous material site in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to be located on hazardous materials sites compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. It is possible that some emission reduction projects implemented in the future could be located on a hazardous material site. For example, emission reduction projects that could be located on hazardous material sites could include installation of new alternative fuel refueling stations and anaerobic digesters, biogas generators.

Because future individual projects in the primary facility categories could have unique characteristics and/or be located on hazardous material sites, it is concluded that Alternative B would create significant adverse indirect hazard impacts. However, because emission reduction projects in the future have the potential to be located on hazardous material sites, potential indirect hazard impacts from implementing Alternative B are considered to be greater than the proposed project. The contribution to cumulative impacts from future Alternative B facilities and emission reduction projects located on hazardous materials sites from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Located within an Airport Land Use Plan or within Two Miles of an Airport

The survey of CEQA documents to evaluate the potential hazard impacts from future projects located with an airport land use plan or within two miles of an airport from the proposed project identified no primary facility categories that would be located with an airport land use plan or within two miles of an airport. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts from future projects located with an airport land use plan or within two miles of an airport, it was concluded that the proposed project would create significant adverse indirect hazard impacts from future projects located with an airport land use plan or within two miles of an airport in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect hazard impacts c from future projects that have the potential to be located within an airport land use plan or within two miles of a public airport compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. Although many emission reduction projects do not involve the use of hazardous materials (e.g., product reformulation to less or non-hazardous materials), some emission reduction projects do involve hazardous materials. For example, one emission reduction project would involve installing new alternative fuel refueling stations. Other emission reduction projects involve replacing one type of fuel, e.g., diesel, with other types of alternative clean fuels, installing fuel cells that contain phosphoric acid, etc.

Because future individual projects in the primary facility categories could have unique characteristics and/or include the use of hazardous materials with an airport land use plan or within two miles of an airport, it is concluded that Alternative B would create significant adverse indirect hazard impacts in those areas. However, because emission reduction projects in the future have the potential to generate both beneficial and adverse hazard impacts near airports, potential indirect hazard impacts from implementing Alternative B are considered to be equivalent to the proposed project. The contribution to cumulative hazard impacts from future Alternative B facilities and emission reduction projects to people located within an airport land use plan or within two miles of a public airport from Alternative B is expected to be significant and equivalent to the cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Located within the Vicinity of a Private Airstrip

The survey of CEQA documents to evaluate the potential hazard impacts from future projects located within the vicinity of a private airstrip from the proposed project identified no primary facility categories that would be located within the vicinity of a private airstrip. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts from future projects located within the vicinity of a private airstrip, it was concluded that the proposed project would create significant adverse indirect hazard impacts from future projects located within the vicinity of a private airstrip in the district.

Alternative B also would result in Alternative B would generate similar indirect hazard impacts to people located within the vicinity of a private airstrip compared to the proposed project. The main difference between Alternative B and the proposed project is primarily the indirect effects of potential future emission reduction projects. Although many emission reduction projects do not involve the use of hazardous materials (e.g., product reformulation to less or non-hazardous materials), some emission reduction projects do involve hazardous materials. For example, one emission reduction project would involve installing new alternative fuel refueling stations. Other emission reduction projects involve replacing one type of fuel, e.g., diesel, with other types of alternative clean fuels, installing fuel cells that contain phosphoric acid, etc.

Because future individual projects in the primary facility categories could have unique characteristics and/or include the use of hazardous materials with within the vicinity of a private airstrip, it is concluded that Alternative B would create significant adverse indirect hazard impacts in those areas. However, because emission reduction projects in the future have the potential to generate both beneficial and adverse hazard impacts within the vicinity of private airstrips, potential indirect hazard impacts from implementing Alternative B are considered to be equivalent to the proposed project. The contribution to cumulative hazard impacts from future Alternative B facilities and emission reduction projects to people located within the vicinity of a private airstrip is expected to be significant and equivalent compared to the cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Interfere with Adopted Emergency Plans

The survey of CEQA documents to evaluate the potential hazard impacts from future projects that interfere with adopted emergency plans from the proposed project identified no primary facility categories that would significantly interfere with adopted emergency plans. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location

that could create significant adverse hazard impacts from future projects that interfere with adopted emergency plans, it was concluded that the proposed project would create significant adverse indirect hazard impacts from future projects that interfere with adopted emergency plans in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to interfere with adopted emergency response plans compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. Depending on the configuration and location of the emission reduction projects, they have the potential to interfere with business or adopted local emergency response plans.

Because future individual projects in the primary facility categories could have unique characteristics and/or could be configured or located at a site that has the potential to interfere with adopted emergency response plans, it is concluded that Alternative B would create significant adverse indirect hazard impacts. Further, because emission reduction projects in the future also have the potential to be configured or located at a site that could interfere with adopted emergency response plans, potential indirect impacts from projects interfering with adopted emergency response plans as a result of implementing Alternative B are considered to be greater than the proposed project. The contribution to cumulative impacts from future Alternative B projects that have the potential to interfere with adopted emergency response plans is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Expose People to Risk from Wildland Fires

The survey of CEQA documents to evaluate the potential hazard impacts from exposing people to risk from wildland fires from the proposed project identified no primary facility categories that would significantly expose people to risk from wildland fires. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts from exposing people to risk from wildland fires, it was concluded that the proposed project would create significant adverse indirect hazard impacts from exposing people to risk from wildland fires in the district.

Alternative B would generate similar indirect impacts from future projects that have the potential to expose people to risks from wildland fires compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B would also result in the indirect effects of potential future emission reduction projects.

Some emission reduction projects in which flammable materials are used could be located in or near undeveloped woodland areas. For example, one type of emission reduction project could involve installation of new alternative fuel refueling stations. Other types of emission reduction projects involve replacing one type of fuel, e.g., diesel, with other types of alternative clean fuels.

Because future individual projects in the primary facility categories that handle flammable materials could have unique characteristics and/or may be located in undeveloped areas near woodland areas, it is concluded that Alternative B would create significant adverse indirect hazard impacts greater than the proposed project. The contribution to cumulative impacts from future Alternative B facilities and emission reduction projects that have the potential to expose people to risks from wildfires is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Increase Fire Hazards from Flammable Materials

The survey of CEQA documents to evaluate the potential increase in fire hazard impacts from flammable material from the proposed project identified no primary facility categories that would significantly adversely increase fire hazard impacts from flammable materials. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse fire hazard impacts from flammable material, it was concluded that the proposed project would create significant adverse indirect fire hazard impacts from flammable material in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to increase hazards from flammable materials compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. Some emission reduction projects may involve the use of flammable materials. For example, one type of emission reduction project could involve installation of new alternative fuel refueling stations. Other types of emission reduction projects involve replacing one type of fuel, e.g., diesel, with other types of alternative clean fuels.

Because future individual projects in the primary facility categories could have unique characteristics and/or may involve handling flammable materials, it is concluded that Alternative B would create significant adverse indirect hazard impacts from flammable materials greater than the proposed project. The contribution to cumulative impacts from future Alternative B facilities and emission reduction projects that have the potential to increase hazards from flammable materials is expected to be significant and

greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Alternative C –Large Businesses Prohibited from Accessing Rule 1304 Exemptions

Create a Hazard through Transport, Use, or Disposal of Hazardous Materials

The survey of CEQA documents to evaluate the potential hazard impacts through transport, use, or disposal of hazardous materials from the proposed project identified one primary facility category, utility projects, which would significantly adversely affect hazard impacts through transport, use, or disposal of hazardous materials. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts through transport, use, or disposal of hazardous materials, it was concluded that the proposed project would create significant adverse indirect hazard impacts through transport, use, or disposal of hazardous materials in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer hazard impacts through the transport, use, or disposal of hazardous materials compared to the proposed project.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse hazard impacts through the transport, use, or disposal of hazardous materials. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative C. On balance, it is concluded that potential hazard impacts through the transport, use, or disposal of hazardous materials from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect hazard impacts through the transport, use, or disposal of hazardous materials from implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Create a Hazard through Upset/Accident Conditions

The survey of CEQA documents to evaluate the potential for hazard impacts created through upset or accident conditions from the proposed project identified one primary facility category, utility projects, which would significantly adversely affect hazard

impacts created through upset or accident conditions. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts created through upset or accident conditions, it was concluded that Alternative C would create significant adverse indirect hazard impacts created through upset or accident conditions in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer hazard impacts through upset or accident conditions causing the release of hazardous materials compared to the proposed project.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse hazard impacts through upset or accident conditions causing the release of hazardous materials. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative C. On balance, it is concluded that potential hazard impacts through upset or accident conditions causing the release of hazardous materials from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect hazard impacts through upset or accident conditions causing the release of hazardous materials from Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Emit Hazardous Emissions or Material within One-quarter Mile of a Nearby School

The survey of CEQA documents to evaluate the potential hazard impacts from the emission of hazardous emission or material within one-quarter mile of a nearby school from the proposed project identified no primary facility categories that would significantly emit hazardous emission or material within one-quarter mile of a nearby school. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts from the emission of hazardous emission or material within one-quarter mile of a nearby school, it was concluded that the proposed project would create significant adverse indirect hazard impacts from the emission of hazardous emission or material within one-quarter mile of a nearby school in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer hazard impacts as a result of locating future affected facilities that emit hazardous emissions within one-quarter mile of a nearby school compared to the proposed project.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse hazard impacts as a result of locating future affected facilities that emit hazardous emissions within one-quarter mile of a nearby school. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative C. On balance, it is concluded that potential hazard impacts as a result of locating future affected facilities that emit hazardous emissions within one-quarter mile of a nearby school from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect hazard impacts as a result of locating future affected facilities that emit hazardous emissions within one-quarter mile of a nearby school from implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Located on a Hazardous Material Site (Government Code §65962.5)

The survey of CEQA documents to evaluate the potential hazard impacts from future projects located on a hazardous material site from the proposed project identified no primary facility categories that would be located on a hazardous material site. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts from future projects located on a hazardous material site, it was concluded that the proposed project would create significant adverse indirect hazard impacts from future projects located on a hazardous material site in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer hazard impacts from locating future facilities on a hazardous materials site compared to the proposed project.

Based upon the above information, there would be fewer or less significant potential hazard impacts from locating future facilities on a hazardous materials site as a result of implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect hazard impacts from locating future facilities on a hazardous materials site as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Located with an Airport Land Use Plan or within Two Miles of an Airport

The survey of CEQA documents to evaluate the potential hazard impacts from future projects located with an airport land use plan or within two miles of an airport from the proposed project identified no primary facility categories that would be located with an airport land use plan or within two miles of an airport. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts from future projects located with an airport land use plan or within two miles of an airport, it was concluded that the proposed project would create significant adverse indirect hazard impacts from future projects located with an airport land use plan or within two miles of an airport in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer hazard exposure impacts to people located within an airport land use plan or within two miles of a public airport compared to the proposed project.

Based upon the above information, potential hazard exposure impacts to people located within an airport land use plan or within two miles of a public airport from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect hazard exposure impacts to people located within an airport land use plan or within two miles of a public airport from implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Located within the Vicinity of a Private Airstrip

The survey of CEQA documents to evaluate the potential hazard impacts from future projects located within the vicinity of a private airstrip from the proposed project identified no primary facility categories that would be located within the vicinity of a private airstrip. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts from future projects located within the vicinity of a private airstrip, it was concluded that the proposed project would create significant adverse indirect hazard impacts from future projects located within the vicinity of a private airstrip in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer hazard exposure impacts to people located within the vicinity of a private airstrip compared to the proposed project.

Based upon the above information, the potential hazard exposure impacts to people located within the vicinity of a private airstrip from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect hazard exposure impacts to people located within the vicinity of a private airstrip from implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Interfere with Adopted Emergency Plans

The survey of CEQA documents to evaluate the potential hazard impacts from future projects that interfere with adopted emergency plans from the proposed project identified no primary facility categories that would significantly interfere with adopted emergency plans. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts from future projects that interfere with adopted emergency plans, it was concluded that the proposed project would create significant adverse indirect hazard impacts from future projects that interfere with adopted emergency plans in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer hazard impacts from future affected facilities that have the potential to interfere with adopted emergency response plans compared to the proposed project.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse hazard impacts from future affected facilities that have the potential to interfere with adopted emergency response plans. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative C. On balance, it is concluded that potential hazard impacts from future affected facilities that have the potential to interfere with adopted emergency response plans as a result of implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect hazard impacts from future affected facilities that have the potential to interfere with adopted emergency response plans as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Expose People to Risk from Wildland Fires

The survey of CEQA documents to evaluate the potential hazard impacts from exposing people to risk from wildland fires from the proposed project identified no primary facility categories that would significantly expose people to risk from wildland fires. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts from exposing people to risk from wildland fires, it was concluded that the proposed project would create significant adverse indirect hazard impacts from exposing people to risk from wildland fires in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer hazard impacts from exposing people to risks from wildland fires compared to the proposed project.

Based upon the above information, potential hazard impacts from exposing people to risks from wildland fires as a result of implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect hazard impacts from exposing people to risks from wildland fires as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Increase Fire Hazards from Flammable Materials

The survey of CEQA documents to evaluate the potential impact from increase in fire hazards from flammable materials from the proposed project identified no primary facility categories that would significantly adversely increase fire hazard impacts from flammable materials. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse impact from increase in fire hazards from flammable materials, it was concluded that the proposed project would create significant adverse indirect impact from increase in fire hazards from flammable materials in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer indirect impacts from exposing people to increased hazards from flammable materials compared to the proposed project.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts from exposing people to increased hazards from flammable materials. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative C. On balance, it is concluded that potential impacts from

exposing people to increased hazards from flammable materials from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts from exposing people to increased hazards from flammable materials as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Alternative D - Use of Credits Generated in 2009 and Beyond Only

Create a Hazard through Transport, Use, or Disposal of Hazardous Materials

The survey of CEQA documents to evaluate the potential hazard impacts through transport, use, or disposal of hazardous materials from the proposed project identified one primary facility category, utility projects, which would significantly adversely affect hazard impacts through transport, use, or disposal of hazardous materials. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts through transport, use, or disposal of hazardous materials, it was concluded that the proposed project would create significant adverse indirect hazard impacts through transport, use, or disposal of hazardous materials. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of creating a hazard through transport, use, or disposal of hazardous materials.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse hazard impacts through transport or disposal of hazardous materials. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative D.

In addition to the increased potential for accidental releases of hazardous materials from aging equipment that cannot be replaced or modified due to restrictions on the availability of offsets, Alternative D also has the potential to delay or otherwise impede remediation efforts at contaminated sites. As can be seen in Appendix H, under the permit moratorium that temporarily ended as of January 1, 2010, there were a number of pending permit applications for equipment such as thermal oxidizers or vapor extraction that would be used to remediate soils contaminated with gasoline or other petroleum products. Similarly, there was a number of pending permit applications for equipment such as thermal or catalytic oxidizers or vapor extraction that would be used to clean up contaminated groundwater.

Consequently, under Alternative D, new indirect hazards impacts equipment are considered to be significant and greater than the impacts of the proposed project. In addition, the contribution to cumulative impacts would be greater than the project's contribution.

Create a Hazard through Upset/Accident Conditions

The survey of CEQA documents to evaluate the potential for hazard impacts created through upset or accident conditions from the proposed project identified one primary facility category, utility projects, which would significantly adversely affect hazard impacts created through upset or accident conditions. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts created through upset or accident conditions, it was concluded that the proposed project would create significant adverse indirect hazard impacts created through upset or accident conditions. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of creating a hazard through upset/accident conditions.

As discussed under Alternative A, limitations on the ability to modify or replace sources could also potentially result in adverse impacts from future facilities that have the potential to create hazards through upset or accident conditions from the release of hazardous materials. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative D. On balance, it is concluded that indirect impacts from future land use projects that have the potential to create hazard impacts through accidental releases of hazardous materials as a result of implementing Alternative D are considered to be significant.

As time goes by it is expected that increase hazards through transport, use or disposal of hazardous materials could potentially increase, but public agencies' abilities to handle such hazards would be curtailed because of the limited availability of offsets. Consequently, under Alternative D, indirect hazard impacts resulting from the restricted ability of public agencies to accommodate future growth are considered to be significant and greater than the proposed project. The contribution to cumulative impacts also would be greater than the project's contribution.

Emit Hazardous Emissions or Material within One-quarter Mile of a Nearby School

The survey of CEQA documents to evaluate the potential hazard impacts from the emission of hazardous emission or material within one-quarter mile of a nearby school

from the proposed project identified no primary facility categories that would significantly emit hazardous emission or material within one-quarter mile of a nearby school. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts from the emission of hazardous emission or material within one-quarter mile of a nearby school, it was concluded that the proposed project would create significant adverse indirect hazard impacts from the emission of hazardous emission or material within one-quarter mile of a nearby school in the district. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of hazardous emissions on material within one-quarter mile of a nearby school.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts from future facilities that emit hazardous materials within one-quarter mile of a nearby school. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative D. On balance, it is concluded that indirect impacts from future land use projects that have the potential to emit hazard materials within one-quarter mile of a nearby school as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in fewer or less severe overall impacts on an annual basis. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future facilities that emit hazardous materials within one-quarter mile of a nearby school, but indirect cumulative impacts from facilities that emit hazardous emission within one-quarter mile of a school would be less than the proposed project.

Located on a Hazardous Material Site (Government Code §65962.5)

The survey of CEQA documents to evaluate the potential hazard impacts from future projects located on a hazardous material site from the proposed project identified no primary facility categories that would be located on a hazardous material site. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts from future projects located on a hazardous material site, it was concluded that the proposed project would create significant adverse indirect

hazard impacts from future projects located on a hazardous material site. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of location within an airport land use plan or within two miles of an airport.

Based upon the above information, indirect impacts from future land use projects located on hazardous materials sites as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in fewer or less severe overall impacts on an annual basis. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts as a result of locating future facilities on hazardous material sites, but indirect cumulative hazardous material site impacts would be less than the proposed project.

Located within an Airport Land Use Plan or within Two Miles of an Airport

The survey of CEQA documents to evaluate the potential hazard impacts from future projects located with an airport land use plan or within two miles of an airport from the proposed project identified no primary facility categories that would be located with an airport land use plan or within two miles of an airport. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts from future projects located with an airport land use plan or within two miles of an airport, it was concluded that the proposed project would create significant adverse indirect hazard impacts from future projects located with an airport land use plan or within two miles of an airport.

Based upon the above information, indirect impacts from future land use projects that may be located within an airport land use plan or within two miles of an airport as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in fewer or less severe overall impacts on an annual basis. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency

with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects located within two miles of an airport that could subject persons to safety hazards, but indirect cumulative safety hazard impacts would be less than the proposed project.

Located within the Vicinity of a Private Airstrip

The survey of CEQA documents to evaluate the potential hazard impacts from future projects located within the vicinity of a private airstrip from the proposed project identified no primary facility categories that would be located within the vicinity of a private airstrip. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts from future projects located within the vicinity of a private airstrip, it was concluded that the proposed project would create significant adverse indirect hazard impacts from future projects located within the vicinity of a private airstrip. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of locating within the vicinity of a private airstrip.

Based upon the above information, indirect impacts from future land use projects that may be located within the vicinity of a private airstrip as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in fewer or less severe overall impacts on an annual basis. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative hazard impacts to persons residing in the vicinity of a private airstrip, but indirect cumulative hazard impacts would be less than the proposed project.

Interfere with Adopted Emergency Plans

The survey of CEQA documents to evaluate the potential hazard impacts from future projects that interfere with adopted emergency plans from the proposed project identified no primary facility categories that would significantly interfere with adopted emergency plans. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location

that could create significant adverse hazard impacts from future projects that interfere with adopted emergency plans, it was concluded that the proposed project would create significant adverse indirect hazard impacts from future projects that interfere with adopted emergency plans. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of interference with adopted emergency plans.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts future projects that have the potential to interfere with adopted emergency response plans. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative D. On balance, it is concluded that indirect impacts from future land use projects that have the potential to interfere with adopted emergency response plans as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in fewer or less severe overall impacts on an annual basis. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts future projects that have the potential to interfere with adopted emergency response plans, but indirect cumulative emergency response plan impacts would be less than the proposed project.

Expose People to Risk from Wildland Fires

The survey of CEQA documents to evaluate the potential hazard impacts from exposing people to risk from wildland fires from the proposed project identified no primary facility categories that would significantly expose people to risk from wildland fires. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts from exposing people to risk from wildland fires, it was concluded that the proposed project would create significant adverse indirect hazard impacts from exposing people to risk from wildland fires. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of exposing people to risk from wildland fires.

Based upon the above information, indirect impacts from future land use projects that have the potential to expose people to risks from wildland fires as a result of

implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in fewer or less severe overall impacts on an annual basis. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to expose people to wildland fires, but indirect cumulative wildland fire impacts would be less than the proposed project.

Increase Fire Hazards from Flammable Materials

The survey of CEQA documents to evaluate the potential impact from increase in fire hazards from flammable materials from the proposed project identified no primary facility categories that would significantly adversely increase fire hazard impacts from flammable materials. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse impact from increase in fire hazards from flammable materials, it was concluded that the proposed project would create significant adverse indirect impact from increase in fire hazards from flammable materials. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of increasing fire hazards from flammable materials.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts from future facilities that have the potential to increase fire hazards from flammable materials. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative D. On balance, it is concluded that indirect impacts from future land use projects that have the potential to increase fire hazards from flammable materials as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in fewer or less severe overall impacts on an annual basis. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements.

Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be resulting in significant adverse indirect cumulative impacts from future facilities that have the potential to increase fire hazards from flammable materials, but indirect cumulative fire hazard impacts would be less than the proposed project.

Alternative E – Limited Offset Availability

Create a Hazard through Transport, Use, or Disposal of Hazardous Materials

The survey of CEQA documents to evaluate the potential hazard impacts through transport, use, or disposal of hazardous materials from the proposed project identified one primary facility category, utility projects, which would significantly adversely affect hazard impacts through transport, use, or disposal of hazardous materials. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts through transport, use, or disposal of hazardous materials, it was concluded that the proposed project would create significant adverse indirect hazard impacts through transport, use, or disposal of hazardous materials. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts from future facilities that have the potential to create hazards through transport, use, or disposal of hazardous materials. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative E.

In addition to the increased potential for accidental releases of hazardous materials from aging equipment that cannot be replaced or modified due to restrictions on the availability of offsets, Alternative E also has the potential to delay or otherwise impede remediation efforts at contaminated sites. As can be seen in Appendix H, under the permit moratorium that temporarily ended as of January 1, 2010, there were a number of pending permit applications for equipment such as thermal oxidizers or vapor extraction that would be used to remediate soils contaminated with gasoline or other petroleum products. Similarly, there was a number of pending permit applications for equipment such as thermal or catalytic oxidizers or vapor extraction that would be used to clean up contaminated groundwater.

Consequently, under Alternative E, new indirect hazards impacts are considered to be significant and greater than the impacts of the proposed project. The contribution to cumulative impacts also would be greater than the project's contribution.

Create a Hazard through Upset/Accident Conditions

The analysis of potential adverse indirect hazard impacts created through upset or accident conditions as a result of implementing Alternative E is based on comparing the relative merits of this alternative with the proposed project. The survey of CEQA documents to evaluate the potential for hazard impacts created through upset or accident conditions from the proposed project identified one primary facility category, utility projects, which would significantly adversely affect hazard impacts created through upset or accident conditions. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts created through upset or accident conditions, it was concluded that the proposed project would create significant adverse indirect hazard impacts created through upset or accident conditions. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of creating a hazard through upset/accident conditions.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts from future facilities that have the potential to create hazards through upset or accident conditions. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative E. On balance, it is concluded that project-specific indirect impacts from future facilities that have the potential to create hazards through upset or accident conditions as a result of Alternative E would be significant and greater than the impacts of the proposed project. Similarly, cumulative impacts from future facilities that have the potential to create hazards through upset or accident conditions as a result of implementing Alternative E would be significant and greater than the impacts of the proposed project.

Emit Hazardous Emissions or Material within One-quarter Mile of a Nearby School

The survey of CEQA documents to evaluate the potential hazard impacts from the emission of hazardous emission or material within one-quarter mile of a nearby school from the proposed project identified no primary facility categories that would significantly emit hazardous emission or material within one-quarter mile of a nearby school. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts from the emission of hazardous emission or material within one-quarter mile of a nearby school, it was concluded that the proposed project would create significant adverse indirect hazard impacts from the

emission of hazardous emission or material within one-quarter mile of a nearby school. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of emitting hazardous emissions or material within one-quarter mile of a nearby school.

Indirect impacts from future facilities that have the potential to emit hazardous materials within one-quarter mile of nearby schools as a result of implementing Alternative E would be less than indirect hazardous impacts to schools from the proposed project because fewer representative facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offsets demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts from future facilities that have the potential to emit hazardous materials within one-quarter mile of nearby schools. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative E. On balance, it is concluded that indirect hazardous impacts to schools from Alternative E would be significant, but less compared to the proposed project. Similarly, cumulative impacts from future facilities that have the potential to emit hazardous materials within one-quarter mile of nearby schools as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Located on a Hazardous Material Site (Government Code §65962.5)

The survey of CEQA documents to evaluate the potential hazard impacts from future projects located on a hazardous material site from the proposed project identified no primary facility categories that would be located on a hazardous material site. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts from future projects located on a hazardous material site, it was concluded that the proposed project would create significant adverse indirect hazard impacts from future projects located on a hazardous material site. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of locating on a hazardous material site.

Indirect impacts from future facilities that have the potential to be located on hazardous materials sites as a result of implementing Alternative E would be less than indirect impacts future facilities that have the potential to be located on hazardous materials sites as a result of implementing the proposed project because fewer representative facilities

would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offsets demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, project-specific indirect impacts future facilities that have the potential to be located on hazardous materials sites as a result of implementing Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to be located on hazardous materials sites as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Located within Airport Land Use Plan or within Two Miles of an Airport

The survey of CEQA documents to evaluate the potential hazard impacts from future projects located with an airport land use plan or within two miles of an airport from the proposed project identified no primary facility categories that would be located with an airport land use plan or within two miles of an airport. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts from future projects located with an airport land use plan or within two miles of an airport, it was concluded that the proposed project would create significant adverse indirect hazard impacts from future projects located with an airport land use plan or within two miles of an airport. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of location within airport land use plan or within two miles of an airport.

Indirect hazard impacts to people from future facilities that have the potential to be located within two miles of an airport as a result of implementing Alternative E would be less than indirect hazard impacts to people from future facilities that have the potential to be located within two miles of an airport as a result of implementing the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offsets demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect hazard impacts to people from future

facilities that have the potential to be located within two miles of an airport as a result of implementing Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative hazard impacts to people from future facilities that have the potential to be located within two miles of an airport as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Located within the Vicinity of a Private Airstrip

The analysis of potential adverse indirect hazard impacts from future projects located within the vicinity of a private airstrip as a result of implementing Alternative E is based on comparing the relative merits of this alternative with the proposed project. The survey of CEQA documents to evaluate the potential hazard impacts from future projects located within the vicinity of a private airstrip from the proposed project identified no primary facility categories that would be located within the vicinity of a private airstrip. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts from future projects located within the vicinity of a private airstrip, it was concluded that the proposed project would create significant adverse indirect hazard impacts from future projects located within the vicinity of a private airstrip. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of locating within the vicinity of a private airstrip.

Indirect hazard impacts to people from future facilities that have the potential to be located within the vicinity of a private airstrip as a result of implementing Alternative E would be less than indirect hazard impacts to people from future facilities that have the potential to be located within the vicinity of a private airstrip as a result of implementing the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offsets demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect hazard impacts to people from future facilities that have the potential to be located within the vicinity of a private airstrip as a result of implementing Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative hazard impacts to people from future facilities that have the potential to be located within the vicinity of a private airstrip as a result of implementing Alternative E would be significant, but less than the

proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Interfere with Adopted Emergency Response Plans

The survey of CEQA documents to evaluate the potential hazard impacts from future projects that interfere with adopted emergency plans from the proposed project identified no primary facility categories that would significantly interfere with adopted emergency plans. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts from future projects that interfere with adopted emergency plans, it was concluded that the proposed project would create significant adverse indirect hazard impacts from future projects that interfere with adopted emergency plans. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of interference with adopted emergency response plans.

Indirect hazard impacts from future facilities that have the potential to interfere with adopted emergency response plans as a result of implementing Alternative E would be less than indirect emergency response plan impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts from future facilities that have the potential to interfere with adopted emergency response plans. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative E. On balance, it is concluded that indirect emergency response plan impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative hazard impacts from future facilities that have the potential to interfere with adopted emergency response plans as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Expose People to Risk from Wildland Fires

The survey of CEQA documents to evaluate the potential hazard impacts from exposing people to risk from wildland fires from the proposed project identified no primary

facility categories that would significantly expose people to risk from wildland fires. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse hazard impacts from exposing people to risk from wildland fires, it was concluded that the proposed project would create significant adverse indirect hazard impacts from exposing people to risk from wildland fires in the district.

Indirect hazard impacts from future facilities that have the potential to expose people to risks from wildland fires as a result of implementing Alternative E would be less than indirect wildland fire risk impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect wildland fire risk impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative hazard impacts from future facilities that have the potential to expose people to risks from wildland fires as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Increase Fire Hazards from Flammable Materials

The survey of CEQA documents to evaluate the potential impact from increase in fire hazards from flammable materials from the proposed project identified no primary facility categories that would significantly adversely increase fire hazard impacts from flammable materials. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse impact from increase in fire hazards from flammable materials, it was concluded that the proposed project would create significant adverse indirect impact from increase in fire hazards from flammable materials. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of increased fire hazards from flammable materials.

Indirect hazard impacts from future facilities that have the potential to increase fire hazards from flammable materials as a result of implementing Alternative E would be less than indirect fire hazard impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary

source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If debit demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts from future facilities that have the potential to increase fire hazards from flammable materials. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative E. On balance, it is concluded that project-specific indirect fire hazard impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative hazard impacts from future facilities that have the potential to increase fire hazards from flammable materials as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Hydrology and Water Quality

Proposed Project

The NOP/IS prepared for the proposed project indicated that it has the potential to generate significant adverse hydrology and water quality impacts for the following reasons. The proposed project could allow the development of individual projects that qualify to receive emissions offsets available from the SCAQMD's internal accounts. These individual projects could result in runoff of sediments, construction materials, and accidental spills of fuels and/or lubricants during construction activities that could adversely affect water quality. These individual projects may be required to comply with National Pollution Discharge Elimination System (NPDES) regulations and implement an associated project-specific Storm Water Pollution Prevention Plan (SWPPP) and Source Control Program that would detail best management practices (BMPs) during construction activities, as well as post-construction operational activities. Compliance with existing regulations would minimize potential water quality impacts during construction and operation of each individual project. Construction could also result in the increase in impervious surfaces within the district, which could lead to increased surface runoff from the individual project sites. This increase in runoff could potentially affect existing or planned stormwater drainage systems.

The analysis in Subchapter 5.9 concludes that the proposed project has the potential to create significant adverse impacts. Mitigation of hydrology and water quality impacts would be the responsibility of the public agency (e.g., city or county) that would serve as lead agency on any given future project. Since the SCAQMD cannot predict how a future lead agency might choose to mitigate a particular significant hydrology or water quality impact, the potential exists for future indirect impacts to be significant and unavoidable (i.e., significant even after mitigation).

Violate Water Quality/Discharge Standards

The survey of the 52 CEQA documents shown in Table 5.9-1 revealed that transportation facilities (document #39) have the potential to create significant adverse indirect impacts through violations of future water quality/discharge standards. The CEQA documents for the remaining primary facility categories: agricultural facilities; retail/services facilities; large commercial facilities; entertainment/recreational facilities; institutional facilities; utility facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse indirect impacts through violations of future water quality/discharge standards. Based on the results of the CEQA document survey and the possibility that future individual projects in any of these facility categories could create impacts through violations of future water quality/discharge standards, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental topic area.

Deplete Groundwater Supplies/Interfere with Groundwater Recharge

The survey of the 52 CEQA documents shown in Table 5.9-1 revealed that no primary facility categories were shown to deplete groundwater supplies/interfere with groundwater recharge. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in any of the nine facility categories could generate other changes that could result in depletion of groundwater supplies/interfere with groundwater recharge from a variety of facility categories that obtain offsets from the SCAQMD's internal account, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Alter Existing Drainage Patterns Causing Erosion/Siltation

The survey of the 52 CEQA documents shown in Table 5.9-1 revealed that no primary facility categories were shown to alter existing drainage patterns causing erosion/siltation. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in any of the nine facility categories could generate other changes that could alter existing drainage patterns causing erosion/siltation from a variety of facility categories that obtain offsets from the SCAQMD's internal account, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Alter Existing Drainage Patterns Resulting in Flooding

The survey of the 52 CEQA documents shown in Table 5.9-1 revealed that no primary facility categories were shown to alter existing drainage patterns resulting in flooding. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in any of the nine facility categories could generate other changes that could alter existing drainage patterns resulting in flooding from a variety of facility categories that obtain offsets from the SCAQMD's internal account and, using an abundance of caution, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Create Runoff Exceeding Stormwater Drainage Systems

The survey of the 52 CEQA documents shown in Table 5.9-1 revealed that no primary facility categories were shown to create runoff exceeding stormwater drainage systems. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in any of the nine facility categories could generate other changes that could create runoff exceeding stormwater drainage systems from a variety of facility categories that obtain offsets from the SCAQMD's internal account and, using an abundance of caution, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Degrade Water Quality

The survey of the 52 CEQA documents shown in Table 5.9-1 revealed that transportation facilities (document #39) have the potential to create significant adverse indirect impacts through degradation of water quality in the future. The CEQA documents for the remaining primary facility categories: agricultural facilities; retail/services facilities; large commercial facilities; entertainment/recreational facilities; institutional facilities; utility facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse indirect impacts through degradation of water quality in the future. Based on the results of the CEQA document survey and the possibility that future individual projects in any of these facility categories could create impacts through degradation of water quality in the future, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental topic area.

Placing Housing in 100-year Flood Area

The survey of the 52 CEQA documents shown in Table 5.9-1 revealed that no primary facility categories were shown to place housing in 100-year flood areas. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in any of the nine facility categories could generate other changes that could place housing in 100-year flood areas from a variety of facility categories that obtain offsets from the SCAQMD's internal account, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Impede Flows in 100-year Flood Area

The analysis of potentially significant adverse indirect impacts in this PEA from future facilities that could impede flows in 100-year flood areas as a result of implementing the proposed project was based primarily on the review of 52 CEQA documents prepared for past projects that represent facilities in all nine primary facility categories. The survey of the 52 CEQA documents shown in Table 5.9-1 revealed that no primary facility categories were shown to impede flows in 100-year flood areas. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in any of the nine facility categories could generate other changes that could impede flows in 100-year flood areas from a variety of facility categories that obtain offsets from the SCAQMD's internal account, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Expose People to Flooding Risks

The survey of the 52 CEQA documents shown in Table 5.9-1 revealed that no primary facility categories were shown to expose people to flooding risks. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in any of the nine facility categories could generate other changes that could expose people to flooding risks from a variety of facility categories that obtain offsets from the SCAQMD's internal account, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Inundation by Seiche, Tsunami, or Mudflow

The survey of the 52 CEQA documents shown in Table 5.9-1 revealed that transportation facilities (document #39) have the potential to create conditions for inundation by seiche, tsunami, or mudflow in the future. The CEQA documents for the

remaining primary facility categories: agricultural facilities; retail/services facilities; large commercial facilities; entertainment/recreational facilities; institutional facilities; utility facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse indirect impacts because they did not create conditions for inundation, seiche, or mudflow in the future. Based on the results of the CEQA document survey and the possibility that future individual projects in these facility categories could create conditions for inundation by seiche, tsunami, or mudflow in the future, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental topic area.

Exceed Wastewater Treatment Requirements

The survey of the 52 CEQA documents shown in Table 5.9-1 revealed that no primary facility categories were shown to exceed wastewater treatment requirements. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in any of the nine facility categories could generate other changes that could exceed wastewater treatment requirements from a variety of facility categories that obtain offsets from the SCAQMD's internal account and, using an abundance of caution, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Require New Wastewater Treatment

The survey of the 52 CEQA documents shown in Table 5.9-1 revealed that no primary facility categories were shown to require new wastewater treatment. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in the nine facility categories could generate other changes that could require new wastewater treatment from a variety of facility categories that obtain offsets from the SCAQMD's internal account, of caution, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Require New Stormwater Facilities

The survey of the 52 CEQA documents shown in Table 5.9-1 revealed that no primary facility categories were shown to require new stormwater facilities. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in any of the nine facility categories could generate other changes that could require new stormwater facilities from a variety of facility categories that obtain offsets from the SCAQMD's

internal account, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Have Sufficient Water Supplies

The survey of the 52 CEQA documents shown in Table 5.9-1 did not identify any facilities that had insufficient water supplies. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in any of the nine facility categories could generate other changes that could result in insufficient water supplies to a variety of facility categories that obtain offsets from the SCAQMD's internal account, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Cumulative Impacts

Project impacts to hydrology and water quality could combine with impacts from other past, present and future projects, including projects permitted under SB 827, projects permitted in reliance on ERC's and new power plants entitled to receive offsets pursuant to state law. It is concluded that the proposed project would make a cumulatively considerable contribution to significant cumulative impacts to hydrology and water quality.

Have Adequate Wastewater Treatment Capacity

The survey of the 52 CEQA documents shown in Table 5.9-1 did not identify any facilities that had insufficient wastewater treatment capacity. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in any of the nine facility categories could generate other changes that could result in insufficient wastewater treatment capacity to a variety of facility categories that obtain offsets from the SCAQMD's internal account, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Alternative A - No Project Alternative

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 is in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under the No Project Alternative, it is assumed that facilities that previously relied on access to the SCAQMD's internal accounts in the past to demonstrate equivalency with federal offset requirements, through either Rule 1304 or Rule 1309.1, would no longer have access to those offsets after May 1, 2012, when applying for a permit for new or modified equipment. As a result, the analysis in this PEA assumes that no facilities that previously obtained credits pursuant to Rules 1304 or 1309.1 would be built.

The inability to approve permits for future facilities that previously would have accessed the SCAQMD's internal accounts would result in existing facilities' inability to replace existing equipment beyond its useful lifetime or install new equipment to further accommodate population growth. Similarly, new facilities could not be constructed.

Violate Water Quality/Discharge Standards

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future projects that have the potential to violate water quality or discharge standards uses are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, there would be no facilities that have the potential to violate water quality or discharge standards when compared against the proposed project, so under the No Project Alternative potential future impacts from facilities that violate water quality or discharge standards would not be significant when compared to the proposed project.

Under Alternative A, May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either through Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that could indirectly violate water quality or discharge standards when compared against the proposed project. On the other hand, projects to improve water quality also would not go forward because wastewater treatment and distribution facilities are considered essential public services,

which qualify for use of offsets from the Priority Reserve under proposed Rule 1309.1. In the long run, the impacts of not approving the project would be significant.

As can be seen in Appendix H, under the permit moratorium that ended as of January 1, 2010, there were approximately 70 pending permit applications for a wide variety of types of projects at sewage treatment plants. The following provides an overview of the types of sewage treatment facility projects that would be adversely affected under the No Project Alternative.

- There were approximately seven pending permit applications for emergency backup generators, which would allow the facility to continue operating in the event of an energy outage.
- There were approximately 29 pending permit applications for improvements to, or expansions of sewage treatment facilities.
- There were approximately 16 pending permit applications for miscellaneous other projects, including installation of air pollution or odor control systems at sewage treatment facilities.

As time goes by it is expected that operations at existing sewage treatment facilities might decline because of deteriorating equipment. Further, because existing sewage treatment facilities would not be able to expand and new facilities would most likely not be built in the district in the future, it may be difficult to accommodate future population growth, unless sewage can be transported out of the district. Consequently, in the long term water quality impacts as a result of the inability to expand existing, or construct and operate new sewage treatment facilities would likely be significant and greater than the proposed project.

Deplete Groundwater Supplies/Interfere with Groundwater Recharge

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts

from future facilities that have the potential to deplete groundwater supplies or interfere with groundwater recharge are considered to be significant. Starting May 1, 2012, future facilities that previously would have had access to the SCAQMD's internal accounts, either through Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012 no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future that could deplete groundwater supplies or interfere with groundwater recharge when compared against the proposed project.

Alter Existing Drainage Patterns Causing Erosion/Siltation

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to alter existing drainage patterns causing erosion or siltation are considered to be significant. After May 1, 2012, no future projects that would be affected by the proposed project would be permitted, sited, constructed and operated, so no alteration of existing drainage patterns causing erosion or siltation would be expected to occur. As a result, after May 1, 2012, erosion and siltation impacts are not significant and less than the proposed project.

Alter Existing Drainage Patterns Resulting in Flooding

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the District's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of

the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to alter existing drainage patterns resulting in flooding are considered to be significant. Starting May 1, 2012, future facilities that previously would have had access to the SCAQMD's internal accounts, either through Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that could adversely alter existing drainage patterns resulting in flooding when compared against the proposed project.

Create Runoff Exceeding Stormwater Drainage Systems

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to create runoff exceeding stormwater drainage systems are considered to be significant. Starting May 1, 2012, future facilities that previously would have had access to the SCAQMD's internal accounts, either through Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that could create indirect runoff impacts exceeding stormwater drainage systems when compared against the proposed project.

Degrade Water Quality

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future projects that have the potential to degrade water quality are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets.

Under the No Project Alternative after May 1, 2012, existing equipment would be expected to operate indefinitely into the future without replacement or modification. Since most equipment has a useful lifetime duration, at some point in the future existing equipment would be expected to experience breakdowns and other types of failures that could diminish the capacity of sewage treatment facilities in the district to process raw sewage, especially from equipment that has already been in operation for a number of years. More importantly, new and expanded facilities could not be constructed to accommodate population growth. Consequently, in the long term cumulative impacts as a result of the inability to expand existing, or construct and operate new sewage treatment facilities to accommodate future wastewater generation, thus, resulting in degradation of water quality would likely be significant and greater than the proposed project.

As can be seen in Appendix H, under the permit moratorium that ended as of January 1, 2010, there were approximately 70 pending permit applications for a wide variety of types of projects at sewage treatment plants. The number and types of projects at sewage treatment facilities that were previously on hold are summarized in the "Violate Water Quality/Discharge Standards" subsection above.

As time goes by it is expected that the probability of future facilities degrading water quality could potentially increase. Consequently, under the No Project Alternative, new indirect water degradation impacts are considered to be significant and greater than the impacts of the proposed project.

Placing Housing in 100-year Flood Area

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to result in placing housing in 100-year flood areas are considered to be significant. Starting May 1, 2012, future facilities that previously would have had access to the SCAQMD's internal accounts, either through Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that would require placing housing in 100-year flood areas when compared against the proposed project.

Impede Flows in 100-year Flood Area

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to impede flows in 100-year flood area are considered to be significant. Starting May 1, 2012, new facilities that previously had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that could indirectly impede flows in 100-year flood areas when compared against the proposed project.

Expose People to Flooding Risks

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation

pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to expose people to flooding risks are considered to be significant. Starting May 1, 2012, future facilities that previously would have had access to the SCAQMD's internal accounts, either through Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that could indirectly expose people to flooding risks when compared against the proposed project.

Inundation by Seiche, Tsunami, or Mudflow

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 is in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to cause inundation by seiche, tsunami, or mudflow are considered to be significant. Starting May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future that would be subject to indirect inundation by seiche, tsunami, or mudflow impacts when compared against the proposed project.

Exceed Wastewater Treatment Requirements

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either through Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that could indirectly exceed wastewater treatment requirements when compared against the proposed project. On the other hand, projects to improve wastewater capacity also would not go forward because wastewater treatment and distribution facilities are considered essential public services, which qualify for use of offsets from the Priority Reserve under proposed Rule 1309.1. For the reasons discussed in the section above discussing the potential for violations of water quality and discharge standards, in the long run the impacts would be significant and greater than the proposed project.

Require New Wastewater Treatment

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to require new wastewater treatment are considered to be significant. Starting May 1, 2012, future facilities that previously would have had access to the SCAQMD's internal accounts, either through Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012 no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future that could indirectly require new wastewater treatment when compared against the proposed project.

Require New Stormwater Facilities

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation

pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to require new stormwater facilities are considered to be significant. Starting May 1, 2012, future facilities that previously had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that would increase indirect stormwater runoff impacts that would require constructing new stormwater treatment facilities when compared against the proposed project.

Have Sufficient Water Supplies

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either through Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that could indirectly provide sufficient water supply capacity when compared against the proposed project. On the other hand, projects to provide sufficient water supply capacity also would not go forward because water distribution facilities are considered essential public services, which qualify for use of offsets from the Priority Reserve under proposed Rule 1309.1. For these reasons, in the long run the impacts would be significant.

As time goes by it is expected that the future demand for sufficient water supplies could potentially increase. Consequently, under the No Project Alternative, new indirect water supply impacts resulting from aging equipment are considered to be significant and greater than the impact under the proposed project.

Have Adequate Wastewater Treatment Capacity

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either through Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that could indirectly require additional wastewater treatment capacity when compared against the proposed project. On the other hand, projects to improve wastewater capacity also would not go forward because wastewater treatment and distribution facilities are considered essential public services, which qualify for use of offsets from the Priority Reserve under proposed Rule 1309.1. In the long run the impacts would be significant.

As can be seen in Appendix H, under the permit moratorium that ended as of January 1, 2010, there were approximately 70 pending permit applications for a wide variety of types of projects at sewage treatment plants. The number and types of projects at sewage treatment facilities that were previously on hold are summarized in the "Violate Water Quality/Discharge Standards" subsection above.

As time goes by it is expected that the probability of future facilities requiring additional wastewater treatment capacity could potentially increase. Consequently, under the No Project Alternative, new indirect new wastewater treatment capacity impacts resulting from aging equipment are considered to be significant and greater than the impact under the proposed project.

Alternative B – Offset User Fees for Large Businesses

Violate Water Quality/Discharge Standards

The survey of CEQA documents to evaluate the potential impacts from violation with water quality or discharge standards from the proposed project identified one primary facility category, transportation facilities, that would significantly violate water quality or discharge standards. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from violation

with water quality or discharge standards, it was concluded that the proposed project would create significant adverse indirect impacts from violation with water quality or discharge standards in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect water quality impacts compared to the proposed project. The main difference between Alternative B and the proposed project Alternative B would also result in the indirect effects of potential future emission reduction projects. Although many emission reduction projects do not increase the volumes of wastewater generated in the district that could violate water quality standards, some emission reduction projects may result in violations of water quality or discharge standards, e.g., anaerobic digesters, and installation of new alternative fuel refueling stations.

It is concluded that Alternative B would create significant adverse indirect impacts from future facilities violating water quality standards. The contribution to cumulative water quality impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Deplete Groundwater Supplies/Interfere with Groundwater Recharge

The survey of CEQA documents to evaluate the potential impacts from depletion of groundwater supplies or interference with groundwater discharge from the proposed project identified no primary facility categories that would significantly adversely deplete groundwater supplies or interfere with groundwater discharge. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from depletion of groundwater supplies or interference with groundwater discharge, it was concluded that the proposed project would create significant adverse indirect impacts from depletion of groundwater supplies or interference with groundwater discharge in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to deplete groundwater supplies, compared to the proposed project. The main difference between Alternative B and the proposed project Alternative B would also result in the indirect effects of potential future emission reduction projects. Although many emission reduction projects do not adversely affect groundwater supplies or interfere with groundwater recharge, some emission reduction projects have the potential to adversely affect groundwater-related processes. For example, any emissions reduction projects that involve construction of a structure or related appurtenances and paving adjacent areas for parking could interfere with groundwater recharge. Examples of emission reduction

projects that involve construction of structures, parking lots, etc., include anaerobic digesters, biosolids energy production, and installation of new alternative fuel refueling stations.

It is concluded that Alternative B would create significant adverse indirect groundwater-related impacts from future facilities exempt from offsets pursuant to Rules 1304 or 1309.1. Cumulative groundwater or groundwater recharge impacts from Alternative B are expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Alter Existing Drainage Patterns Causing Erosion/Siltation

The survey of CEQA documents to evaluate the potential impacts from altering existing drainage patterns causing erosion or siltation from the proposed project identified no primary facility categories that would significantly adversely alter existing drainage patterns causing erosion or siltation. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from altering existing drainage patterns causing erosion or siltation, it was concluded that the proposed project would create significant adverse indirect impacts from altering existing drainage patterns causing erosion or siltation in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to alter drainage patterns, etc., compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B would also result in the indirect effects of potential future emission reduction projects. Although many emission reduction projects do not adversely affect or alter drainage patterns causing erosion or siltation, some emission reduction projects have the potential to adversely affect drainage patterns. For example, any emissions reduction projects that involve construction of a structure or related appurtenances and paving adjacent areas for parking would likely alter drainage patterns causing erosion or siltation.

It is concluded that Alternative B would create significant adverse indirect impacts from future facilities exempt from offsets pursuant to Rules 1304 or 1309.1 that have the potential to alter drainage patterns. The contribution to cumulative erosion or siltation impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Alter Existing Drainage Patterns Resulting in Flooding

The survey of CEQA documents to evaluate the potential impacts from altering existing drainage patterns resulting in flooding from the proposed project identified no primary facility categories that would significantly adversely alter existing drainage patterns resulting in flooding. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from altering existing drainage patterns resulting in flooding, it was concluded that the proposed project would create significant adverse indirect impacts from altering existing drainage patterns resulting in flooding in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to alter existing drainage patterns, resulting in flooding compared to the proposed project. The main difference between Alternative B and the proposed project Alternative B would also result in the indirect effects of potential future emission reduction projects. Although many emission reduction projects do not adversely affect or alter drainage patterns that could cause flooding, some emission reduction projects have the potential to adversely affect drainage patterns. For example, any emissions reduction projects that involve construction of a structure or related appurtenances and paving adjacent areas for parking could alter drainage patterns resulting in flooding. Examples of emission reduction projects that involve construction of structures, parking lots, etc., include anaerobic digesters, biosolids energy production, installation of new alternative fuel refueling stations, etc.

It is concluded that Alternative B would create significant adverse indirect impacts from future facilities exempt from offsets pursuant to Rules 1304 or 1309.1 that have the potential to alter drainage patterns. The contribution to cumulative flooding impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Create Runoff Exceeding Stormwater Drainage Systems

The survey of CEQA documents to evaluate the potential impacts from creating runoff exceeding stormwater drainage systems from the proposed project identified no primary facility categories that would significantly adversely create runoff exceeding stormwater drainage systems. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from creating runoff exceeding stormwater drainage systems, it was concluded that the proposed project

would create significant adverse indirect impacts from creating runoff exceeding stormwater drainage systems in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to create run-off exceeding stormwater drainage systems compared to the proposed project. The main difference between Alternative B and the proposed project Alternative B would also result in the indirect effects of potential future emission reduction projects. Although many emission reduction projects do not create runoff that could exceed stormwater drainage systems, some emission reduction projects have the potential to adversely affect stormwater drainage systems. For example, any emissions reduction projects that involve construction of a structure or related appurtenances and paving adjacent areas for parking could increase runoff that could adversely affect stormwater drainage systems.

It is concluded that Alternative B would create significant adverse indirect impacts from future facilities exempt from offsets pursuant to Rules 1304 or 1309.1 that have the potential to substantially increase runoff. The contribution to cumulative stormwater drainage system impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Degrade Water Quality

The survey of CEQA documents to evaluate the potential impacts from degradation of water quality from the proposed project identified one primary facility category, transportation facilities, that would significantly adversely impact water quality. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse water quality impacts, it was concluded that the proposed project would create significant adverse indirect impacts on water quality in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar water quality impacts compared to the proposed project. The main difference between Alternative B and the proposed project Alternative B would also result in the indirect effects of potential future emission reduction projects. Although many emission reduction projects do not require additional water and, thus, would not be expected to degrade water quality in the district, some emission reduction projects to require additional water supplies and, therefore, may degrade water quality, e.g., anaerobic digesters, installation of new alternative fuel refueling stations

It is concluded that Alternative B would create significant adverse indirect impacts from future facilities degrading water quality in the district. The contribution to cumulative water quality impacts from Alternative B are expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Placing Housing in 100-year Flood Area

The survey of CEQA documents to evaluate the potential impacts from placing housing in 100-year flood area from the proposed project identified no primary facility categories that would significantly adversely place housing in 100-year flood area. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from placing housing in 100-year flood area, it was concluded that the proposed project would create significant adverse indirect impacts from placing housing in 100-year flood area in the district.

Because the same types of facilities would be built under Alternative B, it is concluded that Alternative B may create significant adverse indirect impacts from future facilities exempt from offsets pursuant to Rules 1304 or 1309.1 that have the potential to induce population growth and associated housing that could be placed in 100-year flood areas. The contribution to cumulative impacts from Alternative B as a result of placing housing in 100-year flood areas are expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Impede Flows in 100-year Flood Area

The survey of CEQA documents to evaluate the potential impacts from impeding flow in 100-year flood area from the proposed project identified no primary facility categories that would significantly adversely impede flow in 100-year flood area. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from impeding flow in 100-year flood area, it was concluded that the proposed project would create significant adverse indirect impacts from impeding flow in 100-year flood area in the district.

The main difference between Alternative B and the proposed project Alternative B would also result in the indirect effects of potential future emission reduction projects. It is possible that future emission reduction projects could be constructed in 100-year flood areas, which could result in impeding floodwater flows. For example, any emissions

reduction projects that involve construction of a structure or related appurtenances and paving adjacent areas for parking could affect floodwater flows if constructed in 100-year flood areas.

It is concluded that Alternative B would create significant adverse indirect impacts from future facilities exempt from offsets pursuant to Rules 1304 or 1309.1 that have the potential to impede floodwater flows. The contribution to cumulative impacts from future Alternative B projects and emission reduction projects that impede flows in 100-year areas is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Expose People to Flooding Risks

The survey of CEQA documents to evaluate the potential impacts from exposing people to flooding risks from the proposed project identified no primary facility categories that would significantly adversely expose people to flooding risks. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exposing people to flooding risks, it was concluded that the proposed project would create significant adverse indirect impacts from exposing people to flooding risks in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to expose people to flooding risks compared to the proposed project. The main difference between Alternative B and the proposed project is primarily the indirect effects of potential future emission reduction projects. It is possible that future emission reduction projects could be constructed in areas that could expose people to flooding risks. For example, any emissions reduction projects that involve construction of a structure or related appurtenances and paving adjacent areas for parking could expose people to flooding risks if constructed in flood areas.

It is concluded that Alternative B would create significant adverse indirect impacts from future facilities exempt from offsets pursuant to Rules 1304 or 1309.1 that have the potential to expose people to flooding risks. The contribution to cumulative impacts from future Alternative B projects and emission reduction projects that could expose people to flooding risks is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Inundation by Seiche, Tsunami, or Mudflow

The survey of CEQA documents to evaluate the potential impacts from inundation by seiche, tsunami, or mudflow from the proposed project identified one primary facility category, transportation facilities, that would significantly adversely affect impacts from inundation by seiche, tsunami, or mudflow. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from inundation by seiche, tsunami, or mudflow, it was concluded that the proposed project would create significant adverse indirect impacts from inundation by seiche, tsunami, or mudflow in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect inundation risk impacts compared to the proposed project. The main difference between Alternative B and the proposed project Alternative B would also result in the indirect effects of potential future emission reduction projects. It is possible that future emission reduction projects could be constructed in areas susceptible to inundation by seiche, tsunami, or mudflow. For example, any emissions reduction projects may involve construction of a structure or related appurtenances and paving adjacent areas for parking in areas that could be affected by seiche, tsunami, or mudflow.

It is concluded that Alternative B would create significant adverse indirect impacts from future facilities exempt from offsets pursuant to Rules 1304 or 1309.1 that have the potential to be adversely affected by inundation impacts. The contribution to cumulative impacts from future Alternative B facilities and emission reduction projects that have the potential to expose people to risks of inundation by seiche, tsunami, or mudflow is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Exceed Wastewater Treatment Requirements

The survey of CEQA documents to evaluate the potential impacts from exceeding wastewater treatment requirements from the proposed project identified no primary facility categories that would significantly adversely exceed wastewater treatment requirements. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exceeding wastewater treatment requirements, it was concluded that the proposed project would create significant adverse indirect impacts from exceeding wastewater treatment requirements in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to exceed wastewater treatment requirements compared to the proposed project. The main difference between Alternative B and the proposed project Alternative B would also result in the indirect effects of potential future emission reduction projects. Although many emission reduction projects do not increase the volumes of wastewater generated in the district that could exceed wastewater treatment requirements, some emission reduction projects may result in exceedances of wastewater treatment requirements, e.g., anaerobic digesters, and installation of new alternative fuel refueling stations.

It is concluded that Alternative B would create significant adverse indirect impacts from future facilities exempt from offsets pursuant to Rules 1304 or 1309.1 that could exceed wastewater treatment requirements. The contribution to cumulative wastewater impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Require New Wastewater Treatment

The survey of CEQA documents to evaluate the potential impacts from requiring new wastewater treatment from the proposed project identified no primary facility categories that would significantly require new wastewater treatment. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from requiring new wastewater treatment, it was concluded that the proposed project would create significant adverse indirect impacts from requiring new wastewater treatment in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to require new wastewater treatment facilities compared to the proposed project. The main difference between Alternative B and the proposed project is primarily the indirect effects of potential future emission reduction projects. Although many emission reduction projects would not increase demand for water and, therefore, would not be expected to increase the volumes of wastewater generated in the district that would require new wastewater treatment facilities, some emission reduction projects may increase demand for water, thus, generating additional wastewater that could require new wastewater treatment facilities, e.g., anaerobic digesters, and installation of new alternative fuel refueling stations.

It is concluded that Alternative B would create significant adverse indirect impacts from future facilities exempt from offsets pursuant to Rules 1304 or 1309.1 that increase the demand for new wastewater treatment facilities. The contribution to cumulative impacts

from future Alternative B facilities and emission reduction projects that have the potential to increase demand for new wastewater treatment facilities is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Require New Stormwater Facilities

The survey of CEQA documents to evaluate the potential impacts from requiring new stormwater facilities from the proposed project identified no primary facility categories that would significantly require new stormwater facilities. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from requiring new stormwater facilities, it was concluded that the proposed project would create significant adverse indirect impacts from requiring new stormwater facilities in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to require new stormwater facilities compared to the proposed project. The main difference between Alternative B and the proposed project Alternative B would also result in the indirect effects of potential future emission reduction projects. Although many emission reduction projects do not create runoff that could require new stormwater facilities, some emission reduction projects have the potential to adversely affect stormwater drainage. For example, any emissions reduction projects that involve construction of a structure or related appurtenances and paving adjacent areas for parking would likely increase runoff that could increase demand for new stormwater facilities.

It is concluded that Alternative B would create significant adverse indirect impacts from future facilities exempt from offsets pursuant to Rules 1304 or 1309.1 that have the potential to substantially increase runoff requiring new stormwater facilities. Cumulative impacts from future Alternative B facilities and emission reduction projects that have the potential to increase demand for new stormwater facilities are expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Have Sufficient Water Supplies

The survey of CEQA documents to evaluate the potential for water supply impacts from the proposed project identified no primary facility categories that would significantly

adversely affect water supply. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse water supply impacts, it was concluded that the proposed project would create significant adverse indirect impacts on water supply in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar water demand impacts compared to the proposed project. The main difference between Alternative B and the proposed project Alternative B would also result in the indirect effects of potential future emission reduction projects. Although many emission reduction projects do not adversely affect water supplies, some emission reduction projects have the potential to adversely affect water supplies. For example, any emissions reduction projects that involve construction of a structure or related appurtenances have the potential to increase demand for water.

It is concluded that Alternative B would create significant adverse indirect water-related impacts from future facilities exempt from offsets pursuant to Rules 1304 or 1309.1. The contribution to cumulative water supply impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Have Adequate Wastewater Treatment Capacity

The survey of CEQA documents to evaluate the potential impacts to wastewater treatment capacity from the proposed project identified no primary facility categories that would significantly adversely affect wastewater treatment capacity. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to wastewater treatment capacity, it was concluded that the proposed project would create significant adverse indirect impacts to wastewater treatment capacity in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to overwhelm existing wastewater treatment capacity compared to the proposed project. The main difference between Alternative B and the proposed project Alternative B would also result in the indirect effects of potential future emission reduction projects. Although many emission reduction projects do not increase demand for water, which could increase the volumes of wastewater generated in the district and, therefore, result in an associated increase in demand for wastewater treatment capacity, some emission reduction projects may require additional water supplies, thus, result in increased

demand for wastewater treatment capacity, e.g., anaerobic digesters, and installation of new alternative fuel refueling stations.

Because the same types of facilities would be built under Alternative B, characteristics and/or may demand for wastewater treatment capacity, it is concluded that Alternative B would create significant adverse indirect impacts from future facilities exempt from offsets pursuant to Rules 1304 or 1309.1 that increase demand for wastewater treatment capacity. The contribution to cumulative wastewater treatment capacity impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Alternative C –Large Businesses Prohibited from Accessing Rule 1304 Exemptions

Violate Water Quality/Discharge Standards

The survey of CEQA documents to evaluate the potential impacts from violation with water quality or discharge standards from the proposed project identified one primary facility category, transportation facilities, that would significantly violate water quality or discharge standards. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from violation with water quality or discharge standards, it was concluded that the proposed project would create significant adverse indirect impacts from violation with water quality or discharge standards in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer water quality impacts compared to the proposed project.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts to water quality. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative C. On balance, it is concluded that potential water quality impacts from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts to water quality from Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Deplete Groundwater Supplies/Interfere with Groundwater Recharge

The survey of CEQA documents to evaluate the potential impacts from depletion of groundwater supplies or interference with groundwater discharge from the proposed project identified no primary facility categories that would significantly adversely deplete groundwater supplies or interfere with groundwater discharge. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from depletion of groundwater supplies or interference with groundwater discharge, it was concluded that Alternative C would create significant adverse indirect impacts from depletion of groundwater supplies or interference with groundwater discharge in the district. Because fewer facilities could be built under Alternative C, it is expected that the same type and number of primary facility categories under the proposed project would generate similar or fewer indirect impacts from future facilities that have the potential to deplete groundwater supplies or interfere with groundwater recharge compared to the proposed project.

Based upon the above information, there would be fewer or less significant potential indirect impacts from future facilities that have the potential to deplete groundwater supplies or interfere with groundwater recharge as a result of implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts from future facilities that have the potential to deplete groundwater supplies or interfere with groundwater recharge as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Alter Existing Drainage Patterns Causing Erosion/Siltation

The survey of CEQA documents to evaluate the potential impacts from altering existing drainage patterns causing erosion or siltation from the proposed project identified no primary facility categories that would significantly adversely alter existing drainage patterns causing erosion or siltation. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from altering existing drainage patterns causing erosion or siltation, it was concluded that the proposed project would create significant adverse indirect impacts from altering existing drainage patterns causing erosion or siltation in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer erosion or siltation impacts from future facilities that have the potential to alter existing drainage patterns compared to the proposed project.

Based upon the above information, potential erosion or siltation impacts from future facilities that have the potential to alter existing drainage patterns as a result of implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect erosion or siltation impacts from future facilities that have the potential to alter existing drainage patterns as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Alter Existing Drainage Patterns Resulting in Flooding

The survey of CEQA documents to evaluate the potential impacts from altering existing drainage patterns resulting in flooding from the proposed project identified no primary facility categories that would significantly adversely alter existing drainage patterns resulting in flooding. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from altering existing drainage patterns resulting in flooding, it was concluded that the proposed project would create significant adverse indirect impacts from altering existing drainage patterns resulting in flooding in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar flooding impacts from future facilities that have the potential to alter existing drainage patterns compared to the proposed project.

Based upon the above information, potential flooding impacts from future facilities that have the potential to alter existing drainage patterns as a result of implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect flooding impacts from future facilities that have the potential to alter existing drainage patterns as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Create Runoff Exceeding Stormwater Drainage Systems

The survey of CEQA documents to evaluate the potential impacts from creating runoff exceeding stormwater drainage systems from the proposed project identified no primary

facility categories that would significantly adversely create runoff exceeding stormwater drainage systems. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from creating runoff exceeding stormwater drainage systems, it was concluded that the proposed project would create significant adverse indirect impacts from creating runoff exceeding stormwater drainage systems in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar runoff impacts from future facilities that have the potential to exceed stormwater drainage systems compared to the proposed project.

Based upon the above information, potential runoff impacts from future facilities that have the potential to exceed stormwater drainage systems as a result of implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect runoff impacts from future facilities that have the potential to exceed stormwater drainage systems as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Degrade Water Quality

The survey of CEQA documents to evaluate the potential impacts from degradation of water quality from the proposed project identified one primary facility category, transportation facilities, that would significantly adversely impact water quality. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse water quality impacts, it was concluded that the proposed project would create significant adverse indirect impacts on water quality in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer water degradation impacts compared to the proposed project.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts to water degradation. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative C. On balance, it is concluded that potential water degradation impacts from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect water degradation from

implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Placing Housing in 100-year Flood Area

The survey of CEQA documents to evaluate the potential impacts from placing housing in 100-year flood area from the proposed project identified no primary facility categories that would significantly adversely place housing in 100-year flood area. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from placing housing in 100-year flood area, it was concluded that the proposed project would create significant adverse indirect impacts from placing housing in 100-year flood area in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer flooding impacts from placing housing in 100-year flood areas compared to the proposed project.

Based upon the above information, to the extent that future affected projects have the potential to induce population growth and associated housing, there would be significant, but fewer or less significant potential flooding impacts from placing housing in 100-year flood areas from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect flood impacts from placing housing in 100-year flood areas as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Impede Flows in 100-year Flood Area

The survey of CEQA documents to evaluate the potential impacts from impeding flow in 100-year flood area from the proposed project identified no primary facility categories that would significantly adversely impede flow in 100-year flood area. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from impeding flow in 100-year flood area, it was concluded that the proposed project would create significant adverse indirect impacts from impeding flow in 100-year flood area in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer indirect

impacts from future facilities located in 100-year flood areas that have the potential to impede or redirect flows compared to the proposed project.

Based upon the above information, potential indirect impacts from future facilities located in 100-year flood areas that have the potential to impede or redirect flows as a result of implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts from future facilities located in 100-year flood areas that have the potential to impede or redirect flows as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Expose People to Flooding Risks

The survey of CEQA documents to evaluate the potential impacts from exposing people to flooding risks from the proposed project identified no primary facility categories that would significantly adversely expose people to flooding risks. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exposing people to flooding risks, it was concluded that the proposed project would create significant adverse indirect impacts from exposing people to flooding risks in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer indirect impacts from future facilities located in 100-year flood areas that have the potential to expose people to the risk of loss, injury, or death from flooding compared to the proposed project.

Based upon the above information, potential indirect impacts from future facilities located in 100-year flood areas that have the potential to expose people to the risk of loss, injury, or death from flooding as a result of implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts to from future facilities located in 100-year flood areas that have the potential to expose people to the risk of loss, injury, or death from flooding as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Inundation by Seiche, Tsunami, or Mudflow

The survey of CEQA documents to evaluate the potential impacts from inundation by seiche, tsunami, or mudflow from the proposed project identified one primary facility category, transportation facilities, that would significantly adversely affect impacts from inundation by seiche, tsunami, or mudflow. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from inundation by seiche, tsunami, or mudflow, it was concluded that the proposed project would create significant adverse indirect impacts from inundation by seiche, tsunami, or mudflow in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer inundation impacts as a result of locating future affected projects in areas subject to seiche, tsunami, or mudflow compared to the proposed project.

Based upon the above information, potential inundation impacts as a result of locating future affected projects in areas subject to seiche, tsunami, or mudflow from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect inundation impacts as a result of locating future affected projects in areas subject to seiche, tsunami, or mudflow from implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Exceed Wastewater Treatment Requirements

The survey of CEQA documents to evaluate the potential impacts from exceeding wastewater treatment requirements from the proposed project identified no primary facility categories that would significantly adversely exceed wastewater treatment requirements. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exceeding wastewater treatment requirements, it was concluded that the proposed project would create significant adverse indirect impacts from exceeding wastewater treatment requirements in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer indirect impacts from future affected facilities that have the potential to exceed wastewater treatment requirements compared to the proposed project.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts from future affected

facilities that have the potential to exceed wastewater treatment requirements. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative C. On balance, it is concluded that potential from future affected facilities that have the potential to exceed wastewater treatment requirements as a result of implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts from future affected facilities that have the potential to exceed wastewater treatment requirements as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Require New Wastewater Treatment

The survey of CEQA documents to evaluate the potential impacts from requiring new wastewater treatment from the proposed project identified no primary facility categories that would significantly require new wastewater treatment. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from requiring new wastewater treatment, it was concluded that the proposed project would create significant adverse indirect impacts from requiring new wastewater treatment in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or less demand by future affected facilities for new wastewater treatment facilities compared to the proposed project.

Based upon the above information, potential demand by future affected facilities for new wastewater treatment facilities as a result of implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect demand impacts by future affected facilities for new wastewater treatment facilities as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Require New Stormwater Facilities

The survey of CEQA documents to evaluate the potential impacts from requiring new stormwater facilities from the proposed project identified no primary facility categories that would significantly require new stormwater facilities. However, because of the

possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from requiring new stormwater facilities, it was concluded that the proposed project would create significant adverse indirect impacts from requiring new stormwater facilities in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or less demand by future affected facilities for new stormwater facilities compared to the proposed project.

Based upon the above information, potential demand by future affected facilities for new stormwater facilities from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect demand by future affected facilities for new stormwater facilities as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Have Sufficient Water Supplies

The survey of CEQA documents to evaluate the potential for water supply impacts from the proposed project identified no primary facility categories that would significantly adversely affect water supply. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse water supply impacts, it was concluded that the proposed project would create significant adverse indirect impacts on water supply in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar wastewater supply capacity impacts compared to the proposed project.

Based upon the above information, potential water supply impacts from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts to water supply from implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Have Adequate Wastewater Treatment Capacity

The survey of CEQA documents to evaluate the potential impacts to wastewater treatment capacity from the proposed project identified no primary facility categories that would significantly adversely affect wastewater treatment capacity. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to wastewater treatment capacity, it was concluded that the proposed project would create significant adverse indirect impacts to wastewater treatment capacity in the district. Because fewer facilities could be built under Alternative C, Alternative C would generate similar wastewater treatment capacity impacts compared to the proposed project.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse wastewater treatment capacity impacts. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative C. On balance, it is concluded that potential wastewater treatment capacity impacts from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect wastewater treatment capacity impacts from implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Alternative D - Use of Credits Generated in 2009 and Beyond Only

Violate Water Quality/Discharge Standards

The analysis of potential indirect impacts from violation with water quality or discharge standards as a result of implementing Alternative D is based on comparing the relative merits of this alternative with the proposed project. The survey of CEQA documents to evaluate the potential impacts from violation with water quality or discharge standards from the proposed project identified one primary facility category, transportation facilities, that would significantly violate water quality or discharge standards. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from violation with water quality or discharge standards, it was concluded that the proposed project would create significant adverse indirect impacts from violation with water quality or discharge standards in the district. Because fewer facilities could be built under Alternative D, Alternative D

would generate similar but fewer impacts in terms of violating water quality/discharge standards.

However, as discussed under Alternative A limitations on the ability to modify or replace sources could also potentially result in adverse impacts from future facilities that have the potential to violate water quality or discharge standards. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative D. As time goes by it is expected that operations at existing sewage treatment facilities might decline because of deteriorating equipment. Further, because existing sewage treatment facilities would not be able to expand and new facilities would most likely not be built in the district in the future, it may be difficult to accommodate future population growth, unless sewage can be transported out of the district. Consequently, in the long term water quality impacts as a result of the inability to expand existing, or construct and operate new sewage treatment facilities would likely be significant and greater than the proposed project. The contribution to cumulative impacts from Alternative D also would be greater than the contribution from the proposed project.

Deplete Groundwater Supplies/Interfere with Groundwater Recharge

The survey of CEQA documents to evaluate the potential impacts from depletion of groundwater supplies or interference with groundwater discharge from the proposed project identified no primary facility categories that would significantly adversely deplete groundwater supplies or interfere with groundwater discharge. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from depletion of groundwater supplies or interference with groundwater discharge, it was concluded that the proposed project would create significant adverse indirect impacts from depletion of groundwater supplies or interference with groundwater discharge in the district. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of depletion of groundwater supplies or interference with groundwater recharge.

Based upon the above information, indirect impacts from future land use projects that have the potential to deplete groundwater supplies as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available each year compared to the proposed project, resulting in fewer or less significant overall impacts. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements.

Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future facilities that have the potential to deplete groundwater supplies or interfere with groundwater recharge, but indirect cumulative groundwater impacts would be less than the proposed project.

Alter Existing Drainage Patterns Causing Erosion/Siltation

The survey of CEQA documents to evaluate the potential impacts from altering existing drainage patterns causing erosion or siltation from the proposed project identified no primary facility categories that would significantly adversely alter existing drainage patterns causing erosion or siltation. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from altering existing drainage patterns causing erosion or siltation, it was concluded that the proposed project would create significant adverse indirect impacts from altering existing drainage patterns causing erosion or siltation in the district. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of altering existing drainage patterns causing erosion/siltation.

Based upon the above information, indirect impacts from future land use projects that have the potential to alter existing drainage patterns or cause erosion or siltation as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available each year compared to the proposed project, resulting in fewer or less significant overall impacts. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future facilities that have the potential to alter existing drainage patterns causing erosion or siltation, but indirect cumulative erosion or siltation impacts would be less than the proposed project.

Alter Existing Drainage Patterns Resulting in Flooding

The survey of CEQA documents to evaluate the potential impacts from altering existing drainage patterns resulting in flooding from the proposed project identified no primary facility categories that would significantly adversely alter existing drainage patterns resulting in flooding. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or

near a location that could create significant adverse indirect impacts from altering existing drainage patterns resulting in flooding, it was concluded that the proposed project would create significant adverse indirect impacts from altering existing drainage patterns resulting in flooding in the district. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of altering existing drainage patterns resulting in flooding.

Based upon the above information, indirect impacts from future land use projects that have the potential to alter existing drainage patterns resulting flooding impacts as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available each year compared to the proposed project, resulting in fewer or less significant overall impacts. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to alter existing drainage patterns resulting in flooding, but indirect cumulative flood impacts would be less than the proposed project.

Create Runoff Exceeding Stormwater Drainage Systems

The survey of CEQA documents to evaluate the potential impacts from creating runoff exceeding stormwater drainage systems from the proposed project identified no primary facility categories that would significantly adversely create runoff exceeding stormwater drainage systems. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from creating runoff exceeding stormwater drainage systems, it was concluded that the proposed project would create significant adverse indirect impacts from creating runoff exceeding stormwater drainage systems in the district. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of creating runoff exceeding stormwater drainage systems.

Based upon the above information, indirect impacts from future land use projects that have the potential to create runoff exceeding stormwater drainage systems as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available each year compared to the proposed project, resulting in fewer or less significant overall impacts. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available

from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to create runoff exceeding stormwater drainage systems, but indirect cumulative stormwater impacts would be less than the proposed project.

Degrade Water Quality

The survey of CEQA documents to evaluate the potential impacts from degradation of water quality from the proposed project identified one primary facility category, transportation facilities, that would significantly adversely impact water quality. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse water quality impacts, it was concluded that the proposed project would create significant adverse indirect impacts on water quality in the district. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of degrading water quality.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts from future projects that have the potential to degrade water quality. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative D. As can be seen in Appendix H, under the permit moratorium that ended as of January 1, 2010, there were approximately 70 pending permit applications for a wide variety of types of projects at sewage treatment plants. The number and types of projects at sewage treatment facilities that were previously on hold are summarized in the "Violate Water Quality/Discharge Standards" subsection above.

As time goes by it is expected that the probability of future facilities degrading water quality could potentially increase. Consequently, under Alternative D, new indirect water degradation impacts resulting from aging equipment are considered to be significant and greater than the impacts of the proposed project. The contribution to cumulative impacts from Alternative D also would be greater than the contribution from the proposed project.

Placing Housing in 100-year Flood Area

The survey of CEQA documents to evaluate the potential impacts from placing housing in 100-year flood area from the proposed project identified no primary facility categories

that would significantly adversely place housing in 100-year flood area. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from placing housing in 100-year flood area, it was concluded that the proposed project would create significant adverse indirect impacts from placing housing in 100-year flood area in the district. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of placing housing in 100-year flood area.

Based upon the above information, indirect impacts from placing housing in 100-year floor areas as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available each year compared to the proposed project, resulting in fewer or less significant overall impacts. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to induce population growth resulting in housing being placed in 100-year flood areas, but indirect cumulative flood risks to housing impacts would be significant, but less than the proposed project.

Impede Flows in 100-year Flood Area

The survey of CEQA documents to evaluate the potential impacts from impeding flow in 100-year flood area from the proposed project identified no primary facility categories that would significantly adversely impede flow in 100-year flood area. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from impeding flow in 100-year flood area, it was concluded that the proposed project would create significant adverse indirect impacts from impeding flow in 100-year flood area in the district. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of impeding flows in 100-year flood area.

Based upon the above information, indirect impacts from future land use projects that have the potential to be located in 100-year flood areas, thus, impeding flood flows as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available each year compared to the proposed project, resulting in fewer or less significant overall impacts. The contribution to cumulative impacts from Alternative D is expected to be significant, but

less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to be located in areas where they could impede 100-year floods, but indirect cumulative flood impacts would be less than the proposed project.

Expose People to Flooding Risks

The survey of CEQA documents to evaluate the potential impacts from exposing people to flooding risks from the proposed project identified no primary facility categories that would significantly adversely expose people to flooding risks. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exposing people to flooding risks, it was concluded that the proposed project would create significant adverse indirect impacts from exposing people to flooding risks in the district. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of exposing people to flooding risks.

Based upon the above information, indirect impacts from future land use projects that have the potential to expose people to flooding risks as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available each year compared to the proposed project, resulting in fewer or less significant overall impacts. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to expose people to flooding risks, but indirect cumulative flood risk impacts would be less than the proposed project.

Inundation by Seiche, Tsunami, or Mudflow

The survey of CEQA documents to evaluate the potential impacts from inundation by seiche, tsunami, or mudflow from the proposed project identified one primary facility

category, transportation facilities, that would significantly adversely affect impacts from inundation by seiche, tsunami, or mudflow. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from inundation by seiche, tsunami, or mudflow, it was concluded that the proposed project would create significant adverse indirect impacts from inundation by seiche, tsunami, or mudflow in the district. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of inundation by seiche, tsunami, or mudflow.

Based upon the above information, indirect impacts from future land use projects that have the potential to be located in areas susceptible to inundation by seiche, tsunami, or mudflow, as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available each year compared to the proposed project, resulting in fewer or less significant overall impacts. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to expose people to inundation by seiche tsunami, or mudflows, but indirect cumulative inundation impacts would be less than the proposed project.

Exceed Wastewater Treatment Requirements

The survey of CEQA documents to evaluate the potential impacts from exceeding wastewater treatment requirements from the proposed project identified no primary facility categories that would significantly adversely exceed wastewater treatment requirements. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exceeding wastewater treatment requirements, it was concluded that the proposed project would create significant adverse indirect impacts from exceeding wastewater treatment requirements in the district. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of exceeding wastewater or treatment requirements.

On the other hand, projects to improve wastewater capacity also would be restricted because wastewater treatment and distribution facilities are considered essential public services, which qualify for use of offsets from the Priority Reserve under proposed Rule

1309.1. In the long run the impacts would be significant and greater than the proposed project. The contribution to cumulative impacts from Alternative D also would be greater than the contribution from the proposed project.

Require New Wastewater Treatment

The survey of CEQA documents to evaluate the potential impacts from requiring new wastewater treatment from the proposed project identified no primary facility categories that would significantly require new wastewater treatment. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from requiring new wastewater treatment, it was concluded that the proposed project would create significant adverse indirect impacts from requiring new wastewater treatment in the district. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of requiring new wastewater treatment.

Based upon the above information, indirect impacts from future land use projects that have the potential increase demand for new wastewater treatment facilities as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available each year compared to the proposed project, resulting in fewer or less significant overall impacts. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to require new wastewater treatment facilities, but indirect cumulative wastewater impacts would be less than the proposed project.

Require New Stormwater Facilities

The survey of CEQA documents to evaluate the potential impacts from requiring new stormwater facilities from the proposed project identified no primary facility categories that would significantly require new stormwater facilities. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from requiring new stormwater facilities, it was concluded that the proposed project would create significant adverse indirect impacts from requiring new stormwater facilities in the district. Because fewer facilities could be built under

Alternative D, Alternative D would generate similar but fewer impacts in terms of requiring new stormwater facilities.

Based upon the above information, indirect impacts from future land use projects that have the potential to violate increase demand for new stormwater facilities as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available each year compared to the proposed project, resulting in fewer or less significant overall impacts. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to require new stormwater facilities, but indirect cumulative stormwater impacts would be less than the proposed project.

Have Sufficient Water Supplies

The survey of CEQA documents to evaluate the potential for water supply impacts from the proposed project identified no primary facility categories that would significantly adversely affect water supply. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse water supply impacts, it was concluded that the proposed project would create significant adverse indirect impacts on water supply in the district.

Under Alternative D, existing offset accounts would be eliminated and only offsets from shutdowns of currently permitted sources obtaining offsets from SCAQMD offset accounts starting in the year 2009 would be available starting in the year 2010. As a result, offsets would only be available for future replacement of existing water infrastructure equipment.

However, water delivery operations are eligible for offsets as "essential public services" under Rule 1309.1. Offsets, under Rule 1309.1 would not be available for new facilities to accommodate population growth. As can be seen in Appendix H, under the permit moratorium that ended as of January 1, 2010, there were two pending permit applications for equipment at water facilities. Because of insufficient availability of offsets under Alternative D, new equipment used to provide and transport water could not be built, thereby limiting the ability to provide water to accommodate population growth.

Consequently, under Alternative D, indirect water impacts resulting from the inability of public agencies to accommodate future growth are considered to be significant and greater than the proposed project. The contribution to cumulative impacts from Alternative D also would be greater than the contribution from the proposed project.

Have Adequate Wastewater Treatment Capacity

The survey of CEQA documents to evaluate the potential impacts to wastewater treatment capacity from the proposed project identified no primary facility categories that would significantly adversely affect wastewater treatment capacity. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to wastewater treatment capacity, it was concluded that the proposed project would create significant adverse indirect impacts to wastewater treatment capacity in the district. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of having adequate wastewater treatment capacity.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts from future projects that have insufficient wastewater treatment capacity. Under Alternative D, existing offset accounts would be eliminated and only offsets from shutdowns of currently permitted sources obtaining offsets from SCAQMD offset accounts starting in the year 2009 would be available starting in the year 2010. As a result, offsets would only be available to for future replacement of existing facilities.

Offsets, however, would not be available for new facilities to accommodate population growth. As can be seen in Appendix H, under the permit moratorium that ended as of January 1, 2010, there were 12 pending permit applications for equipment at sewage treatment facilities.

As can be seen in Appendix H, under the permit moratorium that ended as of January 1, 2010, there were 12 pending permit applications for equipment at sewage treatment facilities. As time goes by it is expected that public agencies would be limited in their ability to provide sewage treatment services to accommodate future population growth because of the limited availability of offsets under Alternative D. Consequently, under Alternative D, indirect wastewater supply impacts resulting from the inability of public agencies to accommodate future growth are considered to be significant and greater than the proposed project. The contribution to cumulative impacts from Alternative D also would be greater than the contribution from the proposed project.

Alternative E – Limited Offset Availability

Violate Water Quality/Discharge Standards

The survey of CEQA documents to evaluate the potential impacts from violation with water quality or discharge standards from the proposed project identified one primary facility category, transportation facilities, that would significantly violate water quality or discharge standards. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from violation with water quality or discharge standards, it was concluded that the proposed project would create significant adverse indirect impacts from violation with water quality or discharge standards in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of violating water quality and discharge standards.

However, as discussed under Alternative A limitations on the ability to modify or replace sources could also potentially result in adverse impacts from future facilities that have the potential to violate water quality. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative E. As time goes by it is expected that operations at existing sewage treatment facilities might decline because of deteriorating equipment. Consequently, in the long term, water quality impacts as a result of restrictions on the ability to expand existing, or construct and operate new sewage treatment facilities would likely be significant and greater than the proposed project. The contribution to cumulative impacts from Alternative E also would be greater than the contribution from the proposed project.

Deplete Groundwater Supplies/Interfere with Groundwater Recharge

The survey of CEQA documents to evaluate the potential impacts from depletion of groundwater supplies or interference with groundwater discharge from the proposed project identified no primary facility categories that would significantly adversely deplete groundwater supplies or interfere with groundwater discharge. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from depletion of groundwater supplies or interference with groundwater discharge, it was concluded that the proposed project would create significant adverse indirect impacts from depletion of groundwater supplies or interference with groundwater discharge in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of groundwater supplies and interference with groundwater recharge.

Indirect impacts from future facilities that have the potential to deplete groundwater supplies or interfere with groundwater recharge as a result of implementing Alternative E would be less than indirect groundwater impacts from the proposed project because fewer representative facilities would be constructed and operated in the future. The reason for this conclusion is as follows. Under Alternative E, it is assumed that the same number of new credits would be generated each year as the proposed project and all new credits generated would be used to offset emissions to demonstrate equivalency with federal offset requirements. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, project-specific indirect groundwater impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, cumulative impacts from future facilities that have the potential to deplete groundwater supplies or interfere with groundwater recharge as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Alter Existing Drainage Patterns Causing Erosion/Siltation

The survey of CEQA documents to evaluate the potential impacts from altering existing drainage patterns causing erosion or siltation from the proposed project identified no primary facility categories that would significantly adversely alter existing drainage patterns causing erosion or siltation. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from altering existing drainage patterns causing erosion or siltation, it was concluded that the proposed project would create significant adverse indirect impacts from altering existing drainage patterns causing erosion or siltation in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of altering existing drainage patterns resulting in flooding.

Indirect impacts from future facilities that have the potential to alter existing drainage patterns causing erosion or siltation as a result of implementing Alternative E would be less than indirect erosion or siltation impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant

industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, project-specific indirect erosion or siltation impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to alter existing drainage patterns causing erosion or siltation as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Alter Existing Drainage Patterns Resulting in Flooding

The survey of CEQA documents to evaluate the potential impacts from altering existing drainage patterns resulting in flooding from the proposed project identified no primary facility categories that would significantly adversely alter existing drainage patterns resulting in flooding. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from altering existing drainage patterns resulting in flooding, it was concluded that the proposed project would create significant adverse indirect impacts from altering existing drainage patterns resulting in flooding in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of altering existing drainage patterns resulting in flooding.

Indirect impacts from future facilities that have the potential to alter existing drainage patterns resulting in flooding as a result of implementing Alternative E would be less than indirect flooding impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, project-specific indirect flooding impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, cumulative impacts from future facilities that have the potential to alter existing drainage patterns resulting in flooding as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Create Runoff Exceeding Stormwater Drainage Systems

The survey of CEQA documents to evaluate the potential impacts from creating runoff exceeding stormwater drainage systems from the proposed project identified no primary

facility categories that would significantly adversely create runoff exceeding stormwater drainage systems. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from creating runoff exceeding stormwater drainage systems, it was concluded that the proposed project would create significant adverse indirect impacts from creating runoff exceeding stormwater drainage systems in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of creating runoff exceeding stormwater drainage systems.

Indirect impacts from future facilities that have the potential to create runoff exceeding stormwater drainage systems as a result of implementing Alternative E would be less than indirect stormwater drainage system impacts from the proposed project because fewer representative facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, project-specific indirect stormwater drainage system impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to create runoff exceeding stormwater drainage systems as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Degrade Water Quality

The survey of CEQA documents to evaluate the potential impacts from degradation of water quality from the proposed project identified one primary facility category, transportation facilities, that would significantly adversely impact water quality. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse water quality impacts, it was concluded that the proposed project would create significant adverse indirect impacts on water quality in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of degrading water quality.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse water quality impacts. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative E. As can be seen in Appendix H,

under the permit moratorium that ended as of January 1, 2010, there were approximately 70 pending permit applications for a wide variety of types of projects at sewage treatment plants. The number and types of projects at sewage treatment facilities that were previously on hold are summarized in the “Violate Water Quality/Discharge Standards” subsection above.

Consequently, under the Alternative E, new indirect water degradation impacts resulting from aging equipment are considered to be significant and greater than the impacts of the proposed project. The contribution to cumulative impacts from Alternative E also would be greater than the contribution from the proposed project.

Placing Housing in 100-year Flood Area

The survey of CEQA documents to evaluate the potential impacts from placing housing in 100-year flood area from the proposed project identified no primary facility categories that would significantly adversely place housing in 100-year flood area. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from placing housing in 100-year flood area, it was concluded that the proposed project would create significant adverse indirect impacts from placing housing in 100-year flood area in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of placing housing in 100-year flood area.

Indirect impacts from future facilities that have the potential to promote placing housing in 100-year flood areas as a result of implementing Alternative E would be less than indirect flooding impacts to housing from the proposed project because fewer representative facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, project-specific indirect flooding impacts to housing from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to promote placing housing in 100-year flood areas as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Impede Flows in 100-year Flood Area

The survey of CEQA documents to evaluate the potential impacts from impeding flow in 100-year flood area from the proposed project identified no primary facility categories that would significantly adversely impede flow in 100-year flood area. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from impeding flow in 100-year flood area, it was concluded that the proposed project would create significant adverse indirect impacts from impeding flow in 100-year flood area in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of impeding flows in 100-year areas.

Indirect impacts from future facilities that have the potential to be located in areas that could impede flood flows in 100-year flood areas as a result of implementing Alternative E would be less than indirect flood flow impacts from the proposed project because fewer representative facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, project-specific indirect flood flow impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to be located in areas that could impede flood flows in 100-year flood areas as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Expose People to Flooding Risks

The survey of CEQA documents to evaluate the potential impacts from exposing people to flooding risks from the proposed project identified no primary facility categories that would significantly adversely expose people to flooding risks. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exposing people to flooding risks, it was concluded that the proposed project would create significant adverse indirect impacts from exposing people to flooding risks in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of exposing people to flooding risks.

Indirect impacts from future facilities that have the potential to expose people to flooding risks as a result of implementing Alternative E would be less than indirect flooding risk impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, project-specific indirect flooding risk impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to expose people to flooding risks as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Inundation by Seiche, Tsunami, or Mudflow

The survey of CEQA documents to evaluate the potential impacts from inundation by seiche, tsunami, or mudflow from the proposed project identified one primary facility category, transportation facilities, that would significantly adversely affect impacts from inundation by seiche, tsunami, or mudflow. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from inundation by seiche, tsunami, or mudflow, it was concluded that the proposed project would create significant adverse indirect impacts from inundation by seiche, tsunami, or mudflow in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of inundation by seiche, tsunami, or mudflow.

Indirect inundation by seiche, tsunami, or mudflow impacts from implementing Alternative E would be less than indirect inundation by seiche, tsunami, or mudflow impacts from the proposed project because fewer representative facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, project-specific indirect inundation by seiche, tsunami, or mudflow impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative inundation

by seiche, tsunami, or mudflow impacts from implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Exceed Wastewater Treatment Requirements

The survey of CEQA documents to evaluate the potential impacts from exceeding wastewater treatment requirements from the proposed project identified no primary facility categories that would significantly adversely exceed wastewater treatment requirements. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exceeding wastewater treatment requirements, it was concluded that the proposed project would create significant adverse indirect impacts from exceeding wastewater treatment requirements in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of exceeding wastewater treatment requirements.

On the other hand, projects to improve wastewater capacity also would be restricted because wastewater treatment and distribution facilities are considered essential public services, which qualify for use of offsets from the Priority Reserve under proposed Rule 1309.1. In the long run the impacts would be significant and greater than the proposed project. The contribution to cumulative impacts from Alternative E also would be greater than the contribution from the proposed project.

Require New Wastewater Treatment

The survey of CEQA documents to evaluate the potential impacts from requiring new wastewater treatment from the proposed project identified no primary facility categories that would significantly require new wastewater treatment. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from requiring new wastewater treatment, it was concluded that the proposed project would create significant adverse indirect impacts from requiring new wastewater treatment in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of requiring new wastewater treatment.

Indirect impacts from future facilities that have the potential to require new wastewater treatment systems as a result of implementing Alternative E would be less than indirect wastewater treatment impacts from the proposed project because fewer representative facilities would be constructed and operated in the future. The reason for this conclusion

is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, project-specific indirect wastewater treatment impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to require new wastewater treatment systems as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Require New Stormwater Facilities

The survey of CEQA documents to evaluate the potential impacts from requiring new stormwater facilities from the proposed project identified no primary facility categories that would significantly require new stormwater facilities. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from requiring new stormwater facilities, it was concluded that the proposed project would create significant adverse indirect impacts from requiring new stormwater facilities in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of requiring new stormwater facilities.

Indirect impacts from future facilities that have the potential to require new stormwater treatment facilities as a result of implementing Alternative E would be less than indirect stormwater facility impacts from the proposed project because fewer representative facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, project-specific indirect stormwater facility impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to require new stormwater treatment facilities as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Have Sufficient Water Supplies

The survey of CEQA documents to evaluate the potential for water supply impacts from the proposed project identified no primary facility categories that would significantly adversely affect water supply. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse water supply impacts, it was concluded that the proposed project would create significant adverse indirect impacts on water supply in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of having adequate wastewater treatment capacity.

Under Alternative E, existing offset accounts would contain 50 percent of the number of offsets from growth compared to the proposed project, although Alternative E would contain the same number of offsets from shutdowns of currently permitted sources obtaining offsets from SCAQMD offset accounts (see Tables 6-100 and 6-101 in Chapter 6). This means that fewer offsets would be available in the future under Alternative E compared to the proposed project. As a result, fewer offsets would be available for future replacement of existing water infrastructure equipment or building new or expanded facilities to accommodate future population growth. As can be seen in Appendix H, under the permit moratorium that ended as of January 1, 2010, there were two pending permit applications for equipment at water facilities. Because of the potential for insufficient availability of offsets under Alternative E, new equipment used by public agencies to provide and transport water would be limited compared to the proposed project, thereby limiting public agencies' ability to provide water to accommodate population growth. In addition, water delivery operations are eligible for offsets under Rule 1309.1 as "essential public services" even if they are operated by a non-governmental entity, and would be affected by Alternative E.

Consequently, under Alternative E, indirect water supply impacts resulting from the inability of public agencies to accommodate future growth are considered to be significant and greater than the proposed project. The contribution to cumulative impacts from Alternative E also would be greater than the contribution from the proposed project.

Have Adequate Wastewater Treatment Capacity

The survey of CEQA documents to evaluate the potential impacts to wastewater treatment capacity from the proposed project identified no primary facility categories that would significantly adversely affect wastewater treatment capacity. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create

significant adverse indirect impacts to wastewater treatment capacity, it was concluded that the proposed project would create significant adverse indirect impacts to wastewater treatment capacity in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of having adequate wastewater treatment capacity.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse wastewater treatment capacity impacts.

Under Alternative E, offset accounts would contain 50 percent of the number of offsets from growth compared to the proposed project, although Alternative E would contain the same number of offsets from shutdowns of currently permitted sources obtaining offsets from SCAQMD offset accounts (see Tables 6-100 and 6-101 in Chapter 6). This means that fewer offsets would be available in the future under Alternative E compared to the proposed project. As a result, fewer offsets would be available for new and expanded wastewater treatment facilities to accommodate future population growth.

As can be seen in Appendix H, under the permit moratorium that ended as of January 1, 2010, there were 12 pending permit applications for equipment at sewage treatment facilities. As time goes by it is expected that public agencies would be more limited in their ability to provide sewage treatment capacity to accommodate future population growth under Alternative E compared to the proposed project because of the more limited availability of offsets under Alternative E. Consequently, under Alternative E, indirect wastewater treatment capacity impacts resulting from the inability of public agencies to accommodate future growth are considered to be significant and greater than the proposed project. The contribution to cumulative impacts from Alternative E also would be greater than the contribution from the proposed project.

Land Use and Planning

Proposed Project

In the NOP/IS for the proposed project, it was concluded that the proposed project would not generate significant adverse land use and planning impacts. The rationale for this conclusion was as follows. Land use and other planning considerations are determined by local governments, and no land use or planning requirements would be directly altered by the proposed project. Individual development projects subject to the proposed rule and amended rule would still be required to comply with local land use requirements. Facilities will need to comply with any requirements and land use designations in order to obtain any necessary approval or permit for the project. Therefore, there would be no direct or indirect impacts on land use and planning.

The analysis in Subsection 5.10 concludes that the proposed project has the potential to adversely affect land use and planning. Mitigation of land use and planning impacts would be the responsibility of the public agency (e.g., city or county) that would serve as lead agency on any given future land use project. Since the SCAQMD cannot predict how a future lead agency might choose to mitigate a particular significant land use and planning impact, the potential exists for future indirect impacts to be significant and unavoidable (i.e., significant even after mitigation).

Physically Divide a Community

The survey of the 52 CEQA documents shown in Table 5.10-1 did not identify any facilities that physically divided a community. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in the nine facility categories could generate other changes that could result in physically dividing a community from a variety of facility categories that obtain offsets from the SCAQMD's internal account, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Conflict with Land Use Plans/Policy

The analysis of potentially significant adverse indirect impacts resulting from conflicts with land use plans/policy in the future from implementing the proposed project was based primarily on the review of 52 CEQA documents prepared for past projects that represent projects in all nine primary facility categories. The survey of the 52 CEQA documents shown in Table 5.9-1 revealed that retail/services facilities (document #6) and large commercial facilities (document #17) have the potential to create significant adverse indirect impacts resulting from conflicts with land use plans/policy. The CEQA documents for the remaining primary facility categories: agricultural facilities; entertainment/recreational facilities; institutional facilities; transportation facilities; utility facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse indirect impacts resulting from conflicts with land use plans/policy. Based on the results of the CEQA document survey and the possibility that future individual projects in all of these facility categories could create impacts resulting from conflicts with land use plans/policy, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental topic area.

Conflict with Habitat Conservation Plans

The survey of the 52 CEQA documents shown in Table 5.10-1 did not identify any facilities that conflicted with habitat conservation plans. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a

snapshot in time. Further, since future individual projects in the nine facility categories could generate other changes that could result in conflicts with habitat conservation plans from a variety of facility categories that obtain offsets from the SCAQMD's internal account, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Cumulative Impacts

Project impacts to land use and planning could combine with impacts from other past, present and future projects, including projects permitted under SB 827, projects permitted in reliance on ERC's and new power plants entitled to receive offsets pursuant to state law. It is concluded that the proposed project would make a cumulatively considerable contribution to significant cumulative impacts to land use and planning.

Alternative A - No Project Alternative

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, land use and planning impacts are considered to be significant. Starting May 1, 2012, there would be no change to current land use planning practices because the past permit moratorium would be expected to be reinstituted and continue into the future. The practical effect of the No Project Alternative is that after May 1, 2012, facilities that previously relied on access to the SCAQMD's internal accounts in the past to demonstrate equivalency with federal offset requirements, through either Rule 1304 or Rule 1309.1, would no longer have access to those offsets when applying for a permit for new or modified equipment. As a result, the analysis in this PEA assumes that no new future projects that previously obtained offsets from the SCAQMD's internal accounts would be constructed and operated under the No Project Alternative. Consequently, after May 1, 2012, impacts from the No Project Alternative are not significant and less than the proposed project.

Physically Divide a Community

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the

issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to physically divide a community are considered to be significant. Starting May 1, 2012, new future projects that previously had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, there would be no newly constructed facilities in the future that could physically divide any communities as a result of implementing Alternative A. As a result, under the No Project Alternative potentially significant adverse indirect impacts that could physically divide any communities in the district would not be expected to occur after May 1 2012, and would be less than the significance determination for the proposed project.

Conflict with Land Use Plans/Policy

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to conflict with land use plans or policies are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012 there would be no newly constructed facilities in the future that could conflict with land use plans or policies as a result of implementing Alternative A. As a result, under the No Project Alternative potentially significant adverse indirect impacts that could conflict with land use plans or policies in the district would not be expected to occur after May 1 2012, and would be less than the significance determination for the proposed project.

Conflict with Habitat Conservation Plan

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to conflict with habitat conservation plans are considered to be significant. Starting May 1, 2012, new future facilities that would have had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, there would be no newly constructed facilities in the future that could cause indirect conflict impacts with habitat conservation plans, so under the No Project Alternative potentially significant adverse indirect impacts that could conflict with habitat conservation plans would not be expected to occur after May 1 2012, and would be less than the significance determination for the proposed project.

Alternative B – Offset User Fees for Large Businesses

Physically Divide a Community

The survey of CEQA documents to evaluate the potential land use and planning impacts from future projects physically dividing a community from the proposed project identified no primary facility categories that would significantly adversely divide a community. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse land use and planning impacts from physically dividing a community, it was concluded that the proposed project would create significant adverse indirect land use and planning impacts from physically dividing a community.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to physically divide communities compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, a number of emission reduction projects, if large enough, could be located in or near areas and,

therefore, may have the potential to physically divide local communities to a certain extent, resulting in adverse land use impacts. Such projects include, but are not limited to: wind turbines, solar collector facilities, and biosolids energy production

For the above reasons, it is concluded that Alternative B would create significant adverse indirect land use impacts greater than the proposed project. The contribution to cumulative impacts from future Alternative B facilities and emission reduction projects that have the potential to physically divide a community is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Conflict with Land Use Plans/Policy

The survey of CEQA documents to evaluate the potential impacts from future projects conflicting with land use plans or policy from the proposed project identified the following primary facility categories that would significantly adversely conflict with land use plans or policy: retail/service facilities and large commercial facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects conflicting with land use plans or policy, it was concluded that the proposed project would create significant adverse indirect impacts from future projects conflicting with land use plans or policy.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to conflict with land use plans and policies compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, a number of emission reduction projects could be located areas that may conflict with land use plans or policies, resulting in adverse indirect impacts to such resources. Such projects include, but are not limited to: wind turbines, solar collector facilities, and biosolids energy production.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect land use impacts greater than the proposed project. The contribution to cumulative impacts from future Alternative B facilities and emission reduction projects that have the potential to conflict with land use plans and policies, is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Conflict with Habitat Conservation Plan

The survey of CEQA documents to evaluate the potential impacts from future projects conflicting with habitat conservation plans from the proposed project identified no primary facility categories that would significantly adversely conflict with habitat conservation plans. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects conflicting with habitat conservation plans, it was concluded that the proposed project would create significant adverse indirect impacts from future projects conflicting with habitat conservation plans.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to conflict with habitat conservation plans compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects that have the potential to conflict with habitat conservation plans. For example, a number of emission reduction projects could be located in or near areas that could conflict with habitat conservation plans, resulting in adverse land use impacts (and adverse biological resources impacts). Such projects include, but are not limited to: wind turbines, solar collector facilities, and biosolids energy production.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect land use impacts greater than the proposed project. The contribution to cumulative impacts from future Alternative B facilities and emission reduction projects that have the potential to conflict habitat conservation plans is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Alternative C – Large Businesses Prohibited from Accessing Rule 1304 Exemptions

Physically Divide a Community

The survey of CEQA documents to evaluate the potential land use and planning impacts from future projects physically dividing a community from the proposed project identified no primary facility categories that would significantly adversely divide a community. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse land use and planning impacts from physically dividing a community, it was concluded that the proposed project would create significant adverse indirect land use and planning impacts from physically

dividing a community. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer indirect impacts from future affected facilities physically dividing communities compared to the proposed project.

Based upon the above information, potential indirect impacts from future affected facilities physically dividing communities as a result of implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts from future affected facilities physically dividing communities as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Conflict with Land Use Plans/Policy

The survey of CEQA documents to evaluate the potential impacts from future projects conflicting with land use plans or policy from the proposed project identified the following primary facility categories that would significantly adversely conflict with land use plans or policy: retail/service facilities and large commercial facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects conflicting with land use plans or policy, it was concluded that the proposed project would create significant adverse indirect impacts from future projects conflicting with land use plans or policy. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer indirect impacts from future affected facilities that have the potential to conflict with land use plans or policies compared to the proposed project.

Based upon the above information, potential indirect impacts from future affected facilities that have the potential to conflict with land use plans or policies as a result of implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts from future affected facilities that have the potential to conflict with land use plans or policies as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Conflict with Habitat Conservation Plans

The survey of CEQA documents to evaluate the potential impacts from future projects conflicting with habitat conservation plans from the proposed project identified no primary facility categories that would significantly adversely conflict with habitat conservation plans. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects conflicting with habitat conservation plans, it was concluded that the proposed project would create significant adverse indirect impacts from future projects conflicting with habitat conservation plans. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer indirect impacts from future affected facilities that have the potential to conflict with habitat conservation plans compared to the proposed project.

Based upon the above information, potential indirect impacts from future affected facilities that have the potential to conflict with habitat conservation plans as a result of implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts from future affected facilities that have the potential to conflict with habitat conservation plans as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Alternative D - Use of Credits Generated in 2009 and Beyond Only

Physically Divide a Community

The survey of CEQA documents to evaluate the potential land use and planning impacts from future projects physically dividing a community from the proposed project identified no primary facility categories that would significantly adversely divide a community. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse land use and planning impacts from physically dividing a community, it was concluded that the proposed project would create significant adverse indirect land use and planning impacts from physically dividing a community. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts from physically dividing a community.

Based upon the above information, indirect impacts from future projects that could physically divide a community as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to physically divide communities, but indirect cumulative community impacts would be less than the proposed project.

Conflict with Land Use Plans/Policies

The survey of CEQA documents to evaluate the potential impacts from future projects conflicting with land use plans or policy from the proposed project identified the following primary facility categories that would significantly adversely conflict with land use plans or policy: retail/service facilities and large commercial facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects conflicting with land use plans or policy, it was concluded that the proposed project would create significant adverse indirect impacts from future projects conflicting with land use plans or policy. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts to land use plans or policies.

Based upon the above information, indirect impacts from future projects that could conflict with land use plans or policies as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is

likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to conflict with land use plans, policies, etc., but indirect cumulative land use impacts would be less than the proposed project.

Conflict with Habitat Conservation Plans

The survey of CEQA documents to evaluate the potential impacts from future projects conflicting with habitat conservation plans from the proposed project identified no primary facility categories that would significantly adversely conflict with habitat conservation plans. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects conflicting with habitat conservation plans, it was concluded that the proposed project would create significant adverse indirect impacts from future projects conflicting with habitat conservation plans. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of conflicts with habitat conservation plans.

Based upon the above information, indirect impacts from future projects that could conflict with habitat conservation plans as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to conflict with habitat conservation plans, but indirect cumulative habitat plan conflict impacts would be less than the proposed project.

Alternative E – Limited Offset Availability

Physically Divide a Community

The survey of CEQA documents to evaluate the potential land use and planning impacts from future projects physically dividing a community from the proposed project identified no primary facility categories that would significantly adversely divide a community. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse land use and planning impacts from physically dividing a community, it was concluded that the proposed project would create significant adverse indirect land use and planning impacts from physically dividing a community. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts from physically dividing a community.

Indirect impacts from future facilities that have the potential to physically divide communities as a result of implementing Alternative E would be less than indirect community impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offsets demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, project-specific indirect community impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to physically divide communities implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Conflict with Land Use Plans/Policy

The survey of CEQA documents to evaluate the potential impacts from future projects conflicting with land use plans or policy from the proposed project identified the following primary facility categories that would significantly adversely conflict with land use plans or policy: retail/service facilities and large commercial facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects conflicting with land use plans or policy, it was concluded that the proposed project would create significant adverse indirect impacts from future projects conflicting with land use plans

or policy. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of conflicts with land use plans and policies.

Indirect impacts from future facilities that have the potential to conflict with land use plans or policies as a result of implementing Alternative E would be less than indirect land use plan conflict impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offsets demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect land use plan conflict impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to conflict with land use plans or policies as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Conflict with Habitat Conservation Plans

The survey of CEQA documents to evaluate the potential impacts from future projects conflicting with habitat conservation plans from the proposed project identified no primary facility categories that would significantly adversely conflict with habitat conservation plans. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects conflicting with habitat conservation plans, it was concluded that the proposed project would create significant adverse indirect impacts from future projects conflicting with habitat conservation plans. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of conflicts with habitat conservation plans.

Indirect impacts from future facilities that have the potential to conflict with habitat conservation plans or policies as a result of implementing Alternative E would be less than indirect habitat conservation plan impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offsets demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant

industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect habitat conservation plan impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, cumulative impacts from future facilities that have the potential to conflict with habitat conservation plans or policies as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Mineral Resources

Proposed Project

In the NOP/IS for the proposed project, it was concluded that the proposed project would not generate significant adverse mineral resources impacts. The rationale for this conclusion was as follows. There are no provisions in the proposed project that would directly result in the loss of availability of a known mineral resource of value to the region and the residents of the state, or of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. The analysis in Subchapter 5.11 concludes, however, that the proposed project has the potential to generate significant adverse cumulative mineral resources impacts.

Loss of Availability of Known Mineral Resources

The survey of the 52 CEQA documents shown in Table 5.11-1 did not identify any facilities that created significant losses of availability of known mineral resources. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in the nine facility categories could generate other changes that could result in significant cumulative loss of availability of known mineral resources from a variety of facility categories that obtain offsets from the SCAQMD's internal accounts, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Loss of Availability of a Locally Important Mineral Resource

The survey of the 52 CEQA documents shown in Table 5.11-1 did not identify any facilities that created significant losses of availability of locally important mineral resources. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in the nine facility categories could generate other changes that could result in significant cumulative loss of availability of locally important mineral resources from a variety of facility categories that obtain offsets from the SCAQMD's internal account,

the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Cumulative Impacts

Project impacts to mineral resources could combine with impacts from other past, present and future projects, including projects permitted under SB 827, projects permitted in reliance on ERC's and new power plants entitled to receive offsets pursuant to state law. It is concluded that the proposed project would make a cumulatively considerable contribution to significant cumulative impacts to mineral resources.

Alternative A - No Project Alternative

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted, but SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, mineral resources impacts are considered to be significant. Starting May 1, 2012, there would be no impacts to mineral resources in the district because a permit moratorium would be expected to continue into the future. Under the No Project Alternative, it is assumed that facilities that previously relied on access to the SCAQMD's internal accounts in the past to demonstrate equivalency with federal offset requirements, through either Rule 1304 or Rule 1309.1, would no longer have access to those offsets when applying for a permit for new or modified equipment. As a result, the analysis in this PEA assumes no new future projects that previously obtained offsets from the SCAQMD's internal accounts would be constructed and operated under the No Project Alternative. Consequently, after May 1, 2012, impacts from the No Project Alternative are not significant and less than the proposed project.

Loss of Availability of Known Mineral Resources

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation

pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to generate losses in the availability of known mineral resources are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets because the past permit moratorium would be reinstituted and continue into the future. Therefore, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future that would indirectly result in the loss of known mineral resources as a result of implementing Alternative A, so under the No Project Alternative potential future impacts that could result in the loss of known mineral resources would not be expected to occur after May 1 2012, and would be less than the significance determination for the proposed project.

Loss of Availability of a Locally Important Mineral Resource

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to generate losses in the availability of locally important mineral resources are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future that would indirectly result in the loss of availability of a locally important mineral resource as a result of implementing Alternative A, so under the No Project Alternative potential future impacts that could result in the loss of availability of a locally important mineral resource would not be expected to occur after May 1 2012, and would be less than the significance determination for the proposed project.

Alternative B – Offset User Fees for Large Businesses

Loss of Availability of Known Mineral Resources

The survey of CEQA documents to evaluate the potential impacts from the loss of availability of known mineral resources from the proposed project identified no primary facility categories that would significantly adversely generate the loss of availability of known mineral resources. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from the loss of availability of known mineral resources, it was concluded that the proposed project would create significant adverse indirect impacts from the loss of availability of known mineral resources.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar mineral resources impacts compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, a number of emission reduction projects could result in the loss of locally important mineral resources, resulting in significant adverse mineral resources impacts. Such projects include, but are not limited to: wind turbines, solar collector facilities, and biosolids energy production.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect mineral resources impacts greater than the proposed project. The contribution to cumulative mineral resources impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Loss of Availability of a Locally Important Mineral Resource

The survey of CEQA documents to evaluate the potential impacts from the loss of availability of a locally important mineral resource from the proposed project identified no primary facility categories that would significantly adversely generate the loss of availability of a locally important mineral resource. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from the loss of availability of a locally important mineral resource, it was concluded that the proposed project would create significant adverse indirect impacts from the loss of availability of a locally important mineral resource.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to result in the loss of availability of locally important mineral resource sites delineated in local general plans compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, a number of emission reduction projects could result in the loss of mineral resources, resulting in significant adverse mineral resources impacts. Such projects include, but are not limited to: wind turbines, solar collector facilities, and biosolids energy production.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect mineral resources impacts greater than the proposed project. The contribution to cumulative impacts from Alternative B as a result of the loss of locally important mineral resources is expected to be greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Alternative C – Large Businesses Prohibited from Accessing Rule 1304 Exemptions

Loss of Availability of Known Mineral Resources

The survey of CEQA documents to evaluate the potential impacts from the loss of availability of known mineral resources from the proposed project identified no primary facility categories that would significantly adversely generate the loss of availability of known mineral resources. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from the loss of availability of known mineral resources, it was concluded that the proposed project would create significant adverse indirect impacts from the loss of availability of known mineral resources. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer mineral resources impacts compared to the proposed project.

Based upon the above information, there would be fewer or less significant potential mineral resources impacts from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect mineral resources impacts from implementing Alternative C would be less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Loss of Availability of a Locally Important Mineral Resource

The survey of CEQA documents to evaluate the potential impacts from the loss of availability of a locally important mineral resource from the proposed project identified no primary facility categories that would significantly adversely generate the loss of availability of a locally important mineral resource. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from the loss of availability of a locally important mineral resource, it was concluded that the proposed project would create significant adverse indirect impacts from the loss of availability of a locally important mineral resource. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer locally important mineral resources impacts compared to the proposed project.

Based upon the above information, there would be fewer or less significant potential locally important mineral resources impacts from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect locally important mineral resources impacts from implementing Alternative C would be less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Alternative D - Use of Credits Generated in 2009 and Beyond Only

Loss of Availability of Known Mineral Resources

The survey of CEQA documents to evaluate the potential impacts from the loss of availability of known mineral resources from the proposed project identified no primary facility categories that would significantly adversely generate the loss of availability of known mineral resources. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from the loss of availability of known mineral resources, it was concluded that the proposed project would create significant adverse indirect impacts from the loss of availability of known mineral resources. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts to known mineral resources.

Based upon the above information, indirect impacts from future projects that could result in the loss of known mineral resources as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are

that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to result in the loss of availability of known mineral resources, but indirect cumulative mineral resources impacts would be less than the proposed project.

Loss of Availability of a Locally Important Mineral Resource

The survey of CEQA documents to evaluate the potential impacts from the loss of availability of a locally important mineral resource from the proposed project identified no primary facility categories that would significantly adversely generate the loss of availability of a locally important mineral resource. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from the loss of availability of a locally important mineral resource, it was concluded that the proposed project would create significant adverse indirect impacts from the loss of availability of a locally important mineral resource. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts to locally important mineral resources.

Based upon the above information, indirect impacts from future projects that could result in the loss of locally important mineral resource sites delineated in local general plans as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to result in the loss of locally important mineral resources delineated in local

general plans, but indirect cumulative mineral resources impacts would be less than the proposed project.

Alternative E – Limited Offset Availability

Loss of Availability of Known Mineral Resources

The survey of CEQA documents to evaluate the potential impacts from the loss of availability of known mineral resources from the proposed project identified no primary facility categories that would significantly adversely generate the loss of availability of known mineral resources. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from the loss of availability of known mineral resources, it was concluded that the proposed project would create significant adverse indirect impacts from the loss of availability of known mineral resources. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts to known mineral resources.

Indirect mineral resources impacts from implementing Alternative E would be less than indirect mineral resources impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offsets demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect mineral resources impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative mineral resources impacts from implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Loss of Availability of a Locally Important Mineral Resource

The survey of CEQA documents to evaluate the potential impacts from the loss of availability of a locally important mineral resource from the proposed project identified no primary facility categories that would significantly adversely generate the loss of availability of a locally important mineral resource. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from the loss of availability of a locally important mineral resource, it was concluded that the proposed project would create significant adverse indirect

impacts from the loss of availability of a locally important mineral resource. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts to locally important mineral resources.

Indirect locally important mineral resources impacts from implementing Alternative E would be less than indirect locally important mineral resources impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offsets demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect locally important mineral resources impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative locally important mineral resources impacts from implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Noise

Proposed Project

The NOP/IS prepared for the proposed project indicated that it has the potential to generate significant adverse noise impacts for the following reasons. The proposed project could allow the development of individual projects that qualify to receive emissions offsets available from the SCAQMD's internal accounts. These individual projects could result in an increase in vehicle trips (both passenger vehicles and trucks) on local roadways, which in turn could result in an increase in noise levels. The individual projects could also cause noise impacts from operation of heavy machinery, cooling towers, HVAC units, etc. Additionally, construction noise could be generated by the broad array of powered, noise-producing mechanical equipment typically used in the construction phase. Because the district encompasses a large area, the potential exists for sensitive receptors to be located within 500 feet of a construction area although it is not possible to determine what specific effects could occur, if any, in the absence of specific information relating to future development activities.

The analysis in subchapter 5.12 concludes that the proposed project has the potential to create significant adverse impacts. Mitigation of noise impacts would be the responsibility of the public agency (e.g., city or county) that would serve as lead agency on any given future project. Since the SCAQMD cannot predict how a future lead agency might choose to mitigate a particular significant noise impact, the potential exists for future indirect impacts to be significant and unavoidable (i.e., significant even after mitigation).

Exceeds Local Noise Standards

The survey of the 52 CEQA documents shown in Table 5.12-1 revealed that large commercial facilities (documents #15 and #19); entertainment/recreational facilities (document #20); and institutional facilities (document #33) have the potential to create significant adverse indirect impacts from facilities causing an exceedance of local noise standards. The CEQA documents for the remaining primary facility categories: agricultural facilities; retail/services facilities; transportation facilities; utility facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse indirect impacts from facilities causing an exceedance of local noise standards in the future. Based on the results of the CEQA document survey and the possibility that future individual projects in all of these facility categories could create impacts from exceedances of local noise standards, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental topic area.

Expose Persons to Excessive Noise/Vibration

The survey of the 52 CEQA documents shown in Table 5.12-1 revealed that large commercial facilities (documents #16 and #19) and institutional facilities (documents #27 and #28) have the potential to create significant adverse indirect impacts from facilities that could expose persons to excessive noise/vibration in the future. The CEQA documents for the remaining primary facility categories: agricultural facilities; retail/services facilities; entertainment facilities; transportation facilities; utility facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse indirect impacts from facilities that could expose persons to excessive noise/vibration in the future. Based on the results of the CEQA document survey and the possibility that future individual projects in all of these facility categories could create impacts exposing persons to excessive noise/vibration in the future, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental topic area.

Permanently Increase Ambient Noise Levels

The survey of the 52 CEQA documents shown in Table 5.12-1 revealed that retail/services facilities (document #5); large commercial facilities (documents #16 and #19); entertainment/recreational facilities (documents #20 and #21); and institutional facilities (documents #32, #33, and #37) have the potential to create significant adverse indirect impacts from facilities that could permanently increase ambient noise levels in the future. The CEQA documents for the remaining primary facility categories: agricultural facilities; transportation facilities; utility facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse indirect impacts from facilities that could permanently increase ambient noise levels in the

future. Based on the results of the CEQA document survey and the possibility that future individual projects in all of these facility categories could permanently increase ambient noise levels in the future, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental topic area.

Temporary/Periodic Increase in Noise Levels

The survey of the 52 CEQA documents shown in Table 5.12-1 revealed that retail/services facilities (document #4); large commercial facilities (documents #12, #15, #16, #17, and #19); entertainment/recreational facilities (documents #20, #21, #22, and #23); institutional facilities (documents #25, #26, #27, #28, #29, #31, #32, #33, and #37); and light industrial/warehouse facilities (document #49) have the potential to create significant adverse indirect impacts from facilities that could cause a temporary/periodic increase noise levels in the future. The CEQA documents for the remaining primary facility categories: agricultural facilities; utility facilities; and heavy industrial projects, did not identify significant adverse indirect impacts from facilities that could temporary/permanent increases in noise levels in the future. Based on the results of the CEQA document survey and the possibility that future individual projects in all of these facility categories could permanently increase ambient noise levels in the future, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental topic area.

Expose People in Areas near Public Airports to Excessive Noise

The survey of the 52 CEQA documents shown in Table 5.12-1 did not identify any facilities that would expose people in areas near public airports to excessive noise. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in the nine facility categories could generate other changes that could result in significant exposure of people in areas near public airports to excessive noise from a variety of facility categories that obtain offsets from the SCAQMD's internal account, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Expose People in Areas near Private Airports to Excessive Noise

The survey of the 52 CEQA documents shown in Table 5.12-1 did not identify any facilities that would expose people in areas near private airports to excessive noise. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in the nine facility categories could generate other changes that could result in significant exposure of people in areas near private airports to excessive noise from a variety of

facility categories that obtain offsets from the SCAQMD's internal account, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Cumulative Impacts

Project impacts to noise could combine with impacts from other past, present and future projects, including projects permitted under SB 827, projects permitted in reliance on ERC's and new power plants entitled to receive offsets pursuant to state law. It is concluded that the proposed project would make a cumulatively considerable contribution to significant cumulative impacts to noise.

Alternative A – No Project Alternative

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted, but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

After May 1, 2012, a permit moratorium would likely be implemented and continue into the future. Under the No Project Alternative, it is assumed that facilities that previously relied on access to the SCAQMD's internal accounts in the past to demonstrate equivalency with federal offset requirements, through either Rule 1304 or Rule 1309.1, would no longer have access to those offsets after May 1, 2012, when applying for a permit for new or modified equipment. As a result, the analysis in this PEA assumes no new future projects that previously obtained offsets from the SCAQMD's internal accounts would be constructed and operated under the No Project Alternative. Consequently, after May 1, 2012, impacts from the No Project Alternative are not significant and less than the proposed project.

Exceeds Local Noise Standards

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to exceed local noise standards are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future that would indirectly result in exceedances of local noise standards as a result of implementing Alternative A, so under the No Project Alternative potential future impacts that could result in exceedances of local noise standards would not be expected to occur after May 1 2012, and would be less than the significance determination for the proposed project.

Expose Persons to Excessive Noise/Vibration

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential expose persons to excessive noise or vibration are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future that would indirectly result in exposing persons to excessive noise or vibration as a result of implementing Alternative A, so under the No Project Alternative potential future impacts that could result in exposing persons to excessive noise or vibration would not be expected to occur after May 1 2012, and would be less than the significance determination for the proposed project.

Permanently Increase Ambient Noise Levels

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the

issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to permanently increase noise levels are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future that would indirectly result in permanently increase noise levels as a result of implementing Alternative A, so under the No Project Alternative potential future impacts that could result in permanently increase noise levels would not be expected to occur after May 1 2012, and would be less than the significance determination for the proposed project.

Temporary/Periodic Increase in Noise Levels

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to temporarily or periodically increase noise levels are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future that would indirectly result in temporarily or periodically increases in noise levels as a result of implementing Alternative A, so under the No Project Alternative potential future impacts that could result in noise impacts would not

be expected to occur after May 1 2012, and would be less than the significance determination for the proposed project.

Expose People in Areas near Public Airports to Excessive Noise

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to expose people in areas near public airports to excessive noise levels are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future that would indirectly result in exposing people in areas near public airports to excessive noise levels as a result of implementing Alternative A, so under the No Project Alternative potential future impacts that could result in exposing people in areas near public airports to excessive noise levels would not be expected to occur after May 1 2012, and would be less than the significance determination for the proposed project.

Expose People in Areas near Private Airports to Excessive Noise

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, XXX impacts are

considered to be significant. Starting May 1, 2012, no future facilities that would have obtained offsets from the SCAQMD's internal accounts would be constructed and operated. There could, however, be a small, but not significant, increase in operations at existing facilities (and associated increases that could expose people in areas near private airports to excessive noise levels). However, indirect temporary or periodic increases in noise levels through increases in operations are not expected to expose people in areas near private airports to excessive noise levels.

Alternative B – Offset User Fees for Large Businesses

Exceeds Local Noise Standards

The survey of CEQA documents to evaluate the potential impacts from future projects exceeding local noise standards from the proposed project identified the following primary facility categories that would significantly adversely exceed local noise standards: large commercial facilities, entertainment/recreational facilities, and institutional facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exceeding local noise standards, it was concluded that the proposed project would create significant adverse indirect impacts from future projects exceeding local noise standards.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to exceed local noise standards compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, a number of emission reduction projects could include noise intensive equipment, resulting in significant adverse noise impacts. Such projects include, but are not limited to: wind turbines, anaerobic digester facilities, and biosolids energy production.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect noise impacts that could exceed local noise standards greater than the proposed project. The contributions to cumulative noise impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Expose Persons to Excessive Noise/Vibration

The survey of CEQA documents to evaluate the potential impacts from exposing persons to excessive noise or vibration from the proposed project identified the following

primary facility categories that would significantly adversely expose persons to excessive noise or vibration: large commercial facilities and institutional facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exposing persons to excessive noise or vibration, it was concluded that the proposed project would create significant adverse indirect impacts from exposing persons to excessive noise or vibration.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to expose persons to excessive noise or vibrations compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, a number of emission reduction projects could include equipment or processes that produce excessive noise or vibrations, resulting in significant adverse noise or vibration impacts. Such projects include, but are not limited to: wind turbines, anaerobic digester facilities, and biosolids energy production.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts due to exposure to excessive noise or vibrations greater than the proposed project. The contribution to cumulative impacts from Alternative B from future facilities that could expose people to excess noise or vibration is expected to be greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Permanently Increase Ambient Noise Levels

The survey of CEQA documents to evaluate the potential impacts from permanently increasing ambient noise levels from the proposed project identified the following primary facility categories that would significantly adversely permanently increase ambient noise levels: retail/service facilities, large commercial facilities, entertainment/recreational facilities, and institutional facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from permanently increasing ambient noise levels, it was concluded that the proposed project would create significant adverse indirect impacts from permanently increasing ambient noise levels.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to permanently increase ambient noise levels compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example,

a number of emission reduction projects could include noise generating equipment or processes, resulting in significant adverse permanent noise impacts. Such projects include, but are not limited to: wind turbines, anaerobic digester facilities, and biosolids energy production.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect permanent noise impacts greater than the proposed project. The contribution to cumulative impacts from future Alternative B facilities that could permanently increase ambient noise levels is expected to be greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Temporary/Periodic Increase in Noise Levels

The survey of CEQA documents to evaluate the potential impacts from a temporary or periodic increase in noise levels from the proposed project identified the following primary facility categories that would significantly adversely temporarily or periodically increase noise levels: retail/service facilities, large commercial facilities, entertainment/recreational facilities, institutional facilities, transportation facilities, and light industrial/warehouse facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from a temporary or periodic increase in noise levels, it was concluded that the proposed project would create significant adverse indirect impacts from a temporary or periodic increase in noise levels.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to create temporary or periodic increases in noise levels compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, a number of emission reduction projects could include equipment or processes that generate periodic increases in noise levels, resulting in significant adverse noise impacts. Such projects include, but are not limited to: wind turbines, anaerobic digester facilities, and biosolids energy production.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect temporary or permanent noise impacts greater than the proposed project. The contribution to cumulative impacts from future Alternative B facilities that could create temporary or periodic increases in noise levels is expected to be greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Expose People in Areas near Public Airports to Excessive Noise

The survey of CEQA documents to evaluate the potential impacts from exposing people in areas near public airports to excessive noise from the proposed project identified no primary facility categories that would significantly adversely expose people in areas near public airports to excessive noise. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exposing people in areas near public airports to excessive noise, it was concluded that the proposed project would create significant adverse indirect impacts from exposing people in areas near public airports to excessive noise.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to expose people in areas near public airports to excessive noise compared to the proposed project. The main difference between Alternative B and the proposed project is primarily the indirect effects of potential future emission reduction projects that have the potential to expose people in areas near public airports to excessive noise levels. For example, any emission reduction projects located near public airports could expose people to excessive noise levels, resulting in significant adverse noise impacts. Such projects include, but are not limited to: wind turbines, anaerobic digester facilities, and biosolids energy production.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect noise impacts to people located in areas near public airports greater than the proposed project. The contribution to cumulative noise impacts to people in areas near public airports from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Expose People in Areas near Private Airports to Excessive Noise

The survey of CEQA documents to evaluate the potential impacts from exposing people in areas near private airports to excessive noise from the proposed project identified no primary facility categories that would significantly adversely expose people in areas near private airports to excessive noise. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exposing people in areas near private airports to excessive noise, it was concluded that the proposed project would create significant adverse indirect impacts from exposing people in areas near private airports to excessive noise.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to expose people in areas near private airstrips to excessive noise compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, any emission reduction projects located near private airstrips could expose people to excessive noise levels, resulting in significant adverse noise impacts. Such projects include, but are not limited to: wind turbines, anaerobic digester facilities, and biosolids energy production.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect noise impacts to people located in areas near private airstrips greater than the proposed project. The contribution to cumulative noise impacts to people in areas near private airstrips from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Alternative C –Large Businesses Prohibited from Accessing Rule 1304 Exemptions

Exceeds Local Noise Standards

The survey of CEQA documents to evaluate the potential impacts from future projects exceeding local noise standards from the proposed project identified the following primary facility categories that would significantly adversely exceed local noise standards: large commercial facilities, entertainment/recreational facilities, and institutional facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exceeding local noise standards, it was concluded that the proposed project would create significant adverse indirect impacts from future projects exceeding local noise standards. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer noise impacts compared to the proposed project.

Based upon the above information, there would be significant, but fewer or less significant potential noise impacts from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect noise impacts as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Expose Persons to Excessive Noise/Vibration

The survey of CEQA documents to evaluate the potential impacts from exposing persons to excessive noise or vibration from the proposed project identified the following primary facility categories that would significantly adversely expose persons to excessive noise or vibration: large commercial facilities and institutional facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exposing persons to excessive noise or vibration, it was concluded that the proposed project would create significant adverse indirect impacts from exposing persons to excessive noise or vibration. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer noise impacts that could expose persons to excessive noise or vibrations compared to the proposed project.

Based upon the above information, there would be significant, but fewer or less significant potential noise impacts that could expose persons to excessive noise or vibrations from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect noise impacts that could expose persons to excessive noise or vibrations as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Permanently Increase Ambient Noise Levels

The survey of CEQA documents to evaluate the potential impacts from permanently increasing ambient noise levels from the proposed project identified the following primary facility categories that would significantly adversely permanently increase ambient noise levels: retail/service facilities, large commercial facilities, entertainment/recreational facilities, and institutional facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from permanently increasing ambient noise levels, it was concluded that the proposed project would create significant adverse indirect impacts from permanently increasing ambient noise levels. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer permanent increases in ambient noise levels compared to the proposed project.

Based upon the above information, there would be significant, but fewer or less significant potential indirect impacts from future affected facilities that have the potential to generate permanent increases in ambient noise levels as a result of

implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts from future affected facilities that have the potential to generate similar permanent increases in ambient noise levels as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Temporary/Periodic Increase in Noise Levels

The survey of CEQA documents to evaluate the potential impacts from a temporary or periodic increase in noise levels from the proposed project identified the following primary facility categories that would significantly adversely temporarily or periodically increase noise levels: retail/service facilities, large commercial facilities, entertainment/recreational facilities, institutional facilities, transportation facilities, and light industrial/warehouse facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from a temporary or periodic increase in noise levels, it was concluded that the proposed project would create significant adverse indirect impacts from a temporary or periodic increase in noise levels. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer indirect impacts from future affected facilities that have the potential to create temporary or periodic increases in noise levels compared to the proposed project.

Based upon the above information, there would be significant, but fewer or less significant potential indirect impacts from future affected facilities that have the potential to create temporary or periodic increases in noise levels as a result of implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts from future affected facilities that have the potential to create temporary or periodic increases in noise levels as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Expose People in Areas near Public Airports to Excessive Noise

The survey of CEQA documents to evaluate the potential impacts from exposing people in areas near public airports to excessive noise from the proposed project identified no primary facility categories that would significantly adversely expose people in areas near public airports to excessive noise. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exposing people in areas near public airports to excessive noise, it was concluded that the proposed project would create significant adverse indirect impacts from exposing people in areas near public airports to excessive noise. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer noise impacts to people in areas near public airports compared to the proposed project.

Based upon the above information, there would be significant, but fewer or less significant potential noise impacts to people in areas near public airports from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect noise impacts to people in areas near public airports as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Expose People in Areas near Private Airports to Excessive Noise

The survey of CEQA documents to evaluate the potential impacts from exposing people in areas near private airports to excessive noise from the proposed project identified no primary facility categories that would significantly adversely expose people in areas near private airports to excessive noise. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exposing people in areas near private airports to excessive noise, it was concluded that the proposed project would create significant adverse indirect impacts from exposing people in areas near private airports to excessive noise. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer noise impacts to people in areas near private airstrips compared to the proposed project.

Based upon the above information, there would be significant, but fewer or less significant potential noise impacts to people in areas near private airstrips from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to

Rule 1304. The contribution to cumulative indirect noise impacts to people in areas near private airstrips as a result of Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Alternative D - Use of Credits Generated in 2009 and Beyond Only

Exceeds Local Noise Standards

The survey of CEQA documents to evaluate the potential impacts from future projects exceeding local noise standards from the proposed project identified the following primary facility categories that would significantly adversely exceed local noise standards: large commercial facilities, entertainment/recreational facilities, and institutional facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exceeding local noise standards, it was concluded that the proposed project would create significant adverse indirect impacts from future projects exceeding local noise standards. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of local noise standards.

Based upon the above information, indirect impacts from future projects that could exceed local noise standards as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to exceed local noise standards, but indirect cumulative noise impacts would be less than the proposed project.

Expose Persons to Excessive Noise/Vibration

The survey of CEQA documents to evaluate the potential impacts from exposing persons to excessive noise or vibration from the proposed project identified the following primary facility categories that would significantly adversely expose persons to excessive noise or vibration: large commercial facilities and institutional facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exposing persons to excessive noise or vibration, it was concluded that the proposed project would create significant adverse indirect impacts from exposing persons to excessive noise or vibration. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of excessive noise or vibration.

Based upon the above information, indirect impacts from future projects that could expose persons to excessive noise or vibrations as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse cumulative noise or vibration impacts, but cumulative noise or vibration impacts less than the proposed project.

Permanently Increase Ambient Noise Levels

The survey of CEQA documents to evaluate the potential impacts from permanently increasing ambient noise levels from the proposed project identified the following primary facility categories that would significantly adversely permanently increase ambient noise levels: retail/service facilities, large commercial facilities, entertainment/recreational facilities, and institutional facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from permanently increasing ambient noise levels, it was concluded that the proposed project would create significant adverse indirect impacts from permanently increasing ambient noise levels. Because fewer facilities could be

built under Alternative D, Alternative D would generate similar but fewer impacts to ambient noise levels.

Based upon the above information, indirect impacts from future projects that could exceed local noise standards as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to permanently increase ambient noise levels, but indirect cumulative noise impacts would be less than the proposed project.

Temporary/Periodic Increase in Noise Levels

The survey of CEQA documents to evaluate the potential impacts from a temporary or periodic increase in noise levels from the proposed project identified the following primary facility categories that would significantly adversely temporarily or periodically increase noise levels: retail/service facilities, large commercial facilities, entertainment/recreational facilities, institutional facilities, transportation facilities, and light industrial/warehouse facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from a temporary or periodic increase in noise levels, it was concluded that the proposed project would create significant adverse indirect impacts from a temporary or periodic increase in noise levels. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts to temporary or periodic increase in noise levels.

Based upon the above information, indirect impacts from future projects that have the potential to create temporary or periodic increases in noise levels as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but

less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to create temporary or periodic increases in noise levels, but indirect cumulative noise impacts would be less than the proposed project.

Expose People in Areas near Public Airports to Excessive Noise

The survey of CEQA documents to evaluate the potential impacts from exposing people in areas near public airports to excessive noise from the proposed project identified no primary facility categories that would significantly adversely expose people in areas near public airports to excessive noise. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exposing people in areas near public airports to excessive noise, it was concluded that the proposed project would create significant adverse indirect impacts from exposing people in areas near public airports to excessive noise. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of exposing people in areas near public airports to excessive noise.

Based upon the above information, indirect impacts from future projects that have the potential to expose people in areas near public airports to excessive noise levels as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to expose people in areas near public airports to excessive noise levels, but indirect cumulative noise impacts would be less than the proposed project.

Expose People in Areas near Private Airports to Excessive Noise

The survey of CEQA documents to evaluate the potential impacts from exposing people in areas near private airports to excessive noise from the proposed project identified no primary facility categories that would significantly adversely expose people in areas near private airports to excessive noise. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exposing people in areas near private airports to excessive noise, it was concluded that the proposed project would create significant adverse indirect impacts from exposing people in areas near private airports to excessive noise. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of exposing people in areas near private airports to excessive noise.

Based upon the above information, indirect impacts from future projects that have the potential to expose people in areas near private airstrips to excessive noise levels as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D are expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to expose people in areas near private airstrips to excessive noise levels, but indirect cumulative noise impacts would be less than the proposed project.

Alternative E – Limited Offset Availability

Exceeds Local Noise Standards

The survey of CEQA documents to evaluate the potential impacts from future projects exceeding local noise standards from the proposed project identified the following primary facility categories that would significantly adversely exceed local noise standards: large commercial facilities, entertainment/recreational facilities, and institutional facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exceeding local noise standards, it was concluded that the proposed project would create significant

adverse indirect impacts from future projects exceeding local noise standards. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of local noise standards.

Indirect impacts from future facilities that have the potential to exceed local noise standards as a result of implementing Alternative E would be less than indirect noise impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offsets demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect noise impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to exceed local noise standards as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Expose Persons to Excessive Noise/Vibration

The survey of CEQA documents to evaluate the potential impacts from exposing persons to excessive noise or vibration from the proposed project identified the following primary facility categories that would significantly adversely expose persons to excessive noise or vibration: large commercial facilities and institutional facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exposing persons to excessive noise or vibration, it was concluded that the proposed project would create significant adverse indirect impacts from exposing persons to excessive noise or vibration. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of exposing persons to excessive noise or vibration.

Indirect impacts from future facilities that have the potential to expose persons to excessive noise or vibration as a result of implementing Alternative E would be less than indirect noise or vibration impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offsets demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect

noise or vibration impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to expose persons to excessive noise or vibration as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Permanently Increase Ambient Noise Levels

The survey of CEQA documents to evaluate the potential impacts from permanently increasing ambient noise levels from the proposed project identified the following primary facility categories that would significantly adversely permanently increase ambient noise levels: retail/service facilities, large commercial facilities, entertainment/recreational facilities, and institutional facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from permanently increasing ambient noise levels, it was concluded that the proposed project would create significant adverse indirect impacts from permanently increasing ambient noise levels. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts to ambient noise levels.

Indirect impacts from future facilities that have the potential to permanently increase noise levels as a result of implementing Alternative E would be less than indirect permanent noise impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If debit demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect permanent noise impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to permanently increase noise levels as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Temporary/Periodic Increase in Noise Levels

The survey of CEQA documents to evaluate the potential impacts from a temporary or periodic increase in noise levels from the proposed project identified the following primary facility categories that would significantly adversely temporarily or periodically

increase noise levels: retail/service facilities, large commercial facilities, entertainment/recreational facilities, institutional facilities, transportation facilities, and light industrial/warehouse facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from a temporary or periodic increase in noise levels, it was concluded that the proposed project would create significant adverse indirect impacts from a temporary or periodic increase in noise levels. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts to temporary or periodic increase in noise levels.

Indirect impacts from future facilities that have the potential to temporarily or periodically increase noise levels as a result of implementing Alternative E would be less than indirect temporary or periodic noise impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offsets demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect temporary or periodic noise impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to temporarily or periodically increase noise levels as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Expose People in Areas near Public Airports to Excessive Noise

The survey of CEQA documents to evaluate the potential impacts from exposing people in areas near public airports to excessive noise from the proposed project identified no primary facility categories that would significantly adversely expose people in areas near public airports to excessive noise. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exposing people in areas near public airports to excessive noise, it was concluded that the proposed project would create significant adverse indirect impacts from exposing people in areas near public airports to excessive noise. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of exposing people in areas near public airports to excessive noise.

Indirect impacts from future facilities that have the potential to expose people in areas near public airports to excessive noise levels as a result of implementing Alternative E

would be less than indirect excessive noise impacts to people near airports from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offsets demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect excessive noise impacts to people near airports from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to expose people in areas near public airports to excessive noise levels as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Expose People in Areas near Private Airports to Excessive Noise

The survey of CEQA documents to evaluate the potential impacts from exposing people in areas near private airports to excessive noise from the proposed project identified no primary facility categories that would significantly adversely expose people in areas near private airports to excessive noise. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from exposing people in areas near private airports to excessive noise, it was concluded that the proposed project would create significant adverse indirect impacts from exposing people in areas near private airports to excessive noise. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of exposing people in areas near private airports to excessive noise.

Indirect impacts from future facilities that have the potential to expose people in areas near private airstrips to excessive noise levels as a result of implementing Alternative E would be less than indirect excessive noise impacts to people near private airstrips from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offsets demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect excessive noise impacts to people near private airstrips from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities

that have the potential to expose people in areas near private airstrips to excessive noise levels as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Population and Housing

Proposed Project

In the NOP/IS for the proposed project, it was concluded that the proposed project would not generate significant adverse population and housing impacts. The rationale for this conclusion was as follows. District population will not be affected directly or indirectly as a result of adopting and implementing the proposed project. The proposed project would not directly result in the creation of new uses and facilities that would affect population growth or induce growth. The proposed project is not expected to appreciably affect employment opportunities and, as such, is not expected to result in the relocation or redistribution of population or growth inducement.

The analysis in subchapter 5.13 concludes that the proposed project has the potential to create adverse impacts. Mitigation of population and housing impacts would be the responsibility of the public agency (e.g., city or county) that would serve as lead agency on any given future project. Since the SCAQMD cannot predict how a future lead agency might choose to mitigate a particular significant population and housing impact, the potential exists for future indirect impacts to be significant and unavoidable (i.e., significant even after mitigation).

Induce Population Growth

The survey of the 52 CEQA documents shown in Table 5.13-1 did not identify any facilities that would induce population growth. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in the nine facility categories could generate other changes that could result in significantly inducing population growth from a variety of facility categories that obtain offsets from the SCAQMD's internal account, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Displace/Require New Housing

The survey of the 52 CEQA documents shown in Table 5.13-1 did not identify any facilities that would induce displace/require new housing. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in the nine facility categories could generate other changes that could result in significantly displacing/requiring new

housing from a variety of facility categories that obtain offsets from the SCAQMD's internal account, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Displace People and Require New Housing

The survey of the 52 CEQA documents shown in Table 5.13-1 did not identify any facilities that would displace people and require new housing. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in the nine facility categories could generate other changes that could result in significantly displacing people and requiring new housing from a variety of facility categories that obtain offsets from the SCAQMD's internal account, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Cumulative Impacts

Project impacts to population and housing could combine with impacts from other past, present and future projects, including projects permitted under SB 827, projects permitted in reliance on ERC's and new power plants entitled to receive offsets pursuant to state law. It is concluded that the proposed project would make a cumulatively considerable contribution to significant cumulative impacts to population and housing.

Alternative A - No Project Alternative

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts.

After May 1, 2012, a permit moratorium would likely be implemented and continue into the future. Under the No Project Alternative, it is assumed that facilities that previously relied on access to the SCAQMD's internal accounts in the past to demonstrate equivalency with federal offset requirements, through either Rule 1304 or Rule 1309.1, would no longer have access to those offsets after May 1, 2012, when applying for a permit for new or modified equipment. As a result, the analysis in this PEA assumes no new future projects that previously obtained offsets from the SCAQMD's internal accounts would be constructed and operated under the No Project Alternative. Consequently, after May 1, 2012, impacts from the No Project Alternative are not significant and less than the proposed project.

Induce Population Growth

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to induce population growth are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, there would be no newly constructed facilities in the future that could indirectly induce population growth in the district compared to the proposed project. As a result, impacts that occur from inducing population growth in the district resulting from Alternative A would not be expected to occur after May 1 2012, and would be less than the significance determination for the proposed project.

Displace/Require New Housing

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to displace or require new housing are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012, there would be no newly constructed facilities in the future that could indirectly displace or require new housing in the district compared to the proposed project. As a result,

indirect impacts that occur from displacing or requiring new housing in the district resulting from Alternative A would not be expected to occur after May 1 2012, and would be less than the significance determination for the proposed project.

Displace People and Require New Housing

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to displace people and require new housing are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012 there would be no newly constructed facilities in the future that could indirectly displace people or require new housing in the district compared to the proposed project. As a result, impacts that occur from displacing people or requiring new housing in the district resulting from Alternative A would not be expected to occur after May 1 2012, and would be less than the significance determination for the proposed project.

Alternative B – Offset User Fees for Large Businesses

Induce Population Growth

The survey of CEQA documents to evaluate the potential for population growth impacts from the proposed project identified no primary facility categories that would significantly adversely affect population growth. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse population growth impacts, it was concluded that the proposed project would create significant adverse indirect impacts on population growth.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect population growth impacts compared to the proposed project. The main difference between Alternative B and the proposed project is

Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, some emission reduction projects may include the installation of renewable energy projects, which could contribute to the local infrastructure and, therefore, induce population growth. Such projects include, but are not limited to: wind turbines, solar collector facilities, and biosolids energy production.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts from inducing population growth greater than the proposed project. The contribution of cumulative population growth impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Displace/Require New Housing

The survey of CEQA documents to evaluate the potential impacts from future projects that displace or require new housing from the proposed project identified no primary facility categories that would significantly adversely displace or require new housing. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects that displace or require new housing, it was concluded that the proposed project would create significant adverse indirect impacts from future projects that displace or require new housing.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect housing impacts compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, some emission reduction projects may include the installation of renewable energy projects, which could contribute to the local infrastructure and, therefore, induce population growth which could result in displacing existing or requiring new housing. Such projects include, but are not limited to: wind turbines, solar collector facilities, and biosolids energy production.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts from inducing population growth that could affect housing to a greater extent than the proposed project. The contribution to cumulative housing impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Displace People and Require New Housing

The survey of CEQA documents to evaluate the potential impacts from future projects that displace people and require new housing from the proposed project identified no primary facility categories that would significantly adversely displace people and require new housing. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects that displace people and require new housing, it was concluded that the proposed project would create significant adverse indirect impacts from future projects that displace people and require new.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to displace people and require new housing compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would the indirect effects of potential future emission reduction projects. For example, some emission reduction projects may include the installation of renewable energy projects, which could contribute to the local infrastructure and, therefore, displace local populations, which could increase demand for housing in the displaced population areas. Such projects include, but are not limited to: wind turbines, solar collector facilities, and biosolids energy production.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts from displacing local population and requiring housing greater than the proposed project. The contribution to cumulative population and housing impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Alternative C –Large Businesses Prohibited from Accessing Rule 1304 Exemptions

Induce Population Growth

The survey of CEQA documents to evaluate the potential for population growth impacts from the proposed project identified no primary facility categories that would significantly adversely affect population growth. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse population growth impacts, it was concluded that the proposed project would create significant adverse indirect impacts on population growth. Because fewer facilities

could be built under Alternative C, Alternative C has the potential to induce similar or less population growth compared to the proposed project.

Based upon the above information, potential impacts generated by future affected facilities that have the potential to induce population growth from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts generated by future affected facilities that have the potential to induce population growth as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Displace/Require New Housing

The survey of CEQA documents to evaluate the potential impacts from future projects that displace or require new housing from the proposed project identified no primary facility categories that would significantly adversely displace or require new housing. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects that displace or require new housing, it was concluded that the proposed project would create significant adverse indirect impacts from future projects that displace or require new housing. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer indirect impacts from displacing or requiring new housing compared to the proposed project.

Based upon the above information, potential impacts from displacing or requiring new housing as a result of implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts from displacing or requiring new housing as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Displace People and Require New Housing

The survey of CEQA documents to evaluate the potential impacts from future projects that displace people and require new housing from the proposed project identified no

primary facility categories that would significantly adversely displace people and require new housing. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects that displace people and require new housing, it was concluded that the proposed project would create significant adverse indirect impacts from future projects that displace people and require new housing. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer indirect impacts from displacing people or requiring new housing compared to the proposed project.

Based upon the above information, potential impacts from displacing people or requiring new housing from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts from displacing people or requiring new housing from implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Alternative D - Use of Credits Generated in 2009 and Beyond Only

Induce Population Growth

The survey of CEQA documents to evaluate the potential for population growth impacts from the proposed project identified no primary facility categories that would significantly adversely affect population growth. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse population growth impacts, it was concluded that the proposed project would create significant adverse indirect impacts on population growth. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts to population growth.

Based upon the above information, indirect impacts from future projects that have the potential to induce population growth as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated

from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to induce population growth, but indirect cumulative population growth impacts would be less than the proposed project.

Displace/Require New Housing

The survey of CEQA documents to evaluate the potential impacts from future projects that displace or require new housing from the proposed project identified no primary facility categories that would significantly adversely displace or require new housing. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects that displace or require new housing, it was concluded that the proposed project would create significant adverse indirect impacts from future projects that displace or require new housing. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of displacing or requiring new housing.

Based upon the above information, indirect impacts from future projects that have the potential to displace or require new housing as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contributions to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to displace or require new housing, but indirect cumulative housing impacts would be less than the proposed project.

Displace People and Require New Housing

The survey of CEQA documents to evaluate the potential impacts from future projects that displace people and require new housing from the proposed project identified no primary facility categories that would significantly adversely displace people and require

new housing. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects that displace people and require new housing, it was concluded that the proposed project would create significant adverse indirect impacts from future projects that displace people and require new housing. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of displacing people and requiring new housing.

Based upon the above information, indirect impacts from future projects that have the potential to displace people and require new housing as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to displace people and require new housing, but indirect cumulative population displacement impacts would be less than the proposed project.

Alternative E – Limited Offset Availability

Induce Population Growth

The survey of CEQA documents to evaluate the potential for population growth impacts from the proposed project identified no primary facility categories that would significantly adversely affect population growth. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse population growth impacts, it was concluded that the proposed project would create significant adverse indirect impacts on population growth. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts to population growth.

Indirect impacts from future facilities that have the potential to induce new population growth as a result of implementing Alternative E would be less than indirect population growth impacts from the proposed project because fewer facilities would be constructed

and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offsets demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect population growth impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to induce new population growth as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Displace/Require New Housing

The survey of CEQA documents to evaluate the potential impacts from future projects that displace or require new housing from the proposed project identified no primary facility categories that would significantly adversely displace or require new housing. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects that displace or require new housing, it was concluded that the proposed project would create significant adverse indirect impacts from future projects that displace or require new housing in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of displacing or requiring new housing.

Indirect impacts from future facilities that have the potential to displace or require new housing as a result of implementing Alternative E would be less than indirect housing impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offsets demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect housing impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contributions to cumulative impacts from future facilities that have the potential to displace or require new housing as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Displace People and Require New Housing

The survey of CEQA documents to evaluate the potential impacts from future projects that displace people and require new housing from the proposed project identified no primary facility categories that would significantly adversely displace people and require new housing. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects that displace people and require new housing, it was concluded that the proposed project would create significant adverse indirect impacts from future projects that displace people and require new housing. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of displacing people and requiring new housing.

Indirect impacts from future facilities that have the potential to displace people and require new housing as a result of implementing Alternative E would be less than indirect displacement and housing impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offsets demand exceeds 50 percent of the 2007 AQMP growth projections for relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect displacement and housing impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to displace people and require new housing as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Public Services

Proposed Project

The NOP/IS prepared for the proposed project indicated that it has the potential to generate significant adverse public services impacts for the following reasons. The proposed project could allow the development of individual projects that qualify to receive emissions offsets available from the SCAQMD's internal accounts. The representative facilities are commercial or industrial projects that could require an increase in the demand for public services, which, depending on their location, may require the construction of new public service facilities or expansion of existing public services facilities. Specifically, operation of the future development could result in an increased demand for fire or police services. Further, construction activities associated

with new development could affect emergency vehicle access and delay police and fire response times due to additional traffic congestion.

The analysis in Subchapter 5.13 concludes that the proposed project has the potential to create significant adverse impacts. Mitigation of public services impacts would be the responsibility of the public agency (e.g., city or county) that would serve as lead agency on any given future project. Since the SCAQMD cannot predict how a future lead agency might choose to mitigate a particular significant public services impact, the potential exists for future indirect impacts to be significant and unavoidable (i.e., significant even after mitigation).

Adverse indirect impacts to Fire Protection

The survey of the 52 CEQA documents shown in Table 5.14-1 revealed that no primary facility categories were shown to adversely affect fire protection resources. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in the nine facility categories could generate other changes that could result in facilities adversely affecting fire protection resources in the future from a variety of facility categories that obtain offsets from the SCAQMD's internal account, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Adverse indirect impacts to Police Protection

The survey of the 52 CEQA documents shown in Table 5.14-1 revealed that no primary facility categories were shown to adversely affect police protection resources. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in the nine facility categories could generate other changes that could result in facilities adversely affecting police protection resources in the future from a variety of facility categories that obtain offsets from the SCAQMD's internal account, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Adverse indirect impacts to Schools

The survey of the 52 CEQA documents shown in Table 5.14-1 revealed that no primary facility categories were shown to adversely affect schools. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in the nine facility categories could generate other changes that could result in facilities adversely affecting schools in

the future from a variety of facility categories that obtain offsets from the SCAQMD's internal account, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Adverse indirect impacts to Parks

The survey of the 52 CEQA documents shown in Table 5.14-1 revealed that entertainment/recreation facilities (document #21) have the potential to create significant adverse indirect impacts to parks. The CEQA documents for the remaining primary facility categories: agricultural facilities; retail/services facilities; large commercial facilities; institutional facilities; utility facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse indirect impacts to parks. Based on the results of the CEQA document survey and the possibility that future individual projects in all of these facility categories could adversely affect parks, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental topic area.

Adverse indirect impacts to Other Public Facilities

The survey of the 52 CEQA documents shown in Table 5.14-1 revealed that no primary facility categories were shown to adversely affect other public facilities. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in the nine facility categories could generate other changes that could result in facilities adversely affecting other public facilities in the future from a variety of facility categories that obtain offsets from the SCAQMD's internal account, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Cumulative Impacts

Project impacts to public services could combine with impacts from other past, present and future projects, including projects permitted under SB 827, projects permitted in reliance on ERC's and new power plants entitled to receive offsets pursuant to state law. It is concluded that the proposed project would make a cumulatively considerable contribution to significant cumulative impacts to public services.

Alternative A - No Project Alternative

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 is in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably

foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts.

Under the No Project Alternative, it is assumed that facilities that previously relied on access to the SCAQMD's internal accounts in the past to demonstrate equivalency with federal offset requirements, through either Rule 1304 or Rule 1309.1, would no longer have access to those offsets after May 1, 2012, when applying for a permit for new or modified equipment. As a result, the analysis in this PEA assumes that no facilities that previously obtained credits pursuant to Rules 1304 or 1309.1 would be built.

The inability to approve permits for future facilities that previously would have accessed the SCAQMD's internal accounts, would result in existing facilities' inability to replace existing equipment beyond its useful lifetime or install new equipment to further accommodate population growth. Similarly, new facilities could not be constructed.

Adverse Indirect Impacts to Fire Protection

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to increase hazards, as discussed in the "Hazards and Hazardous Materials" discussions, are considered to be significant. Since fire departments are first responders to hazardous materials incidents, they would have to respond increasingly to hazardous materials events as result of increasing breakdowns of aging equipment. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, after May 1, 2012 no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated in the future in the district that could increase hazardous materials incidents that could increase the demand for fire protection services when compared to the proposed project.

Under the No Project Alternative after May 1, 2012, existing equipment would be expected to operate indefinitely into the future without replacement or modification because of the permit moratorium. Since most equipment has a useful lifetime duration,

at some point in the future existing equipment would be expected to experience breakdowns and other types of failures that could increase hazardous materials incidents, especially equipment that has already been in operation for a number of years. For example, most of the existing refineries in the district have equipment that has been operating for decades and, as such, may experience accidental fires from combustion sources such as boilers, gas turbines, etc. Further, pending permit applications in Appendix H show that one refinery is proposing to replace two older high emitting and potentially increasingly unsafe cogeneration units and four boilers with new, state-of-the-art equipment that are more efficient, have substantially lower emissions, and are inherently safer.

Another potential indirect hazard impact is associated with installation of backup flares, which require permits from the SCAQMD. Under certain circumstances, flares are considered safety equipment. For example, in the event of dangerous increases in pressure in some refinery operations, excess gases and vapors may be vented to an emergency backup flare to prevent explosions and fires. Similarly, flares used as in an emergency backup capacity to prevent explosions or fires if other types of equipment, e.g., gas turbines, internal combustion engines, boilers, etc., are used as the primary control equipment. As indicated in Appendix H there were four permit applications for backup flares, two at landfills and two at sewage treatment facilities.

As time goes by it is expected that the probability of hazardous materials incidents requiring emergency responders such as fire departments could potentially increase. Further, new or expanded fire service facilities could not be constructed. Consequently, under the No Project Alternative, new indirect impacts to fire protection services are considered to be significant and greater than the impacts of the proposed project.

Adverse Indirect Impacts to Police Protection

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. However, after May 1, 2012, offsets could not be provided for new or expanded police facilities. As a result, police departments would not be able to provide sufficient services to accommodate anticipated population growth. Consequently, under the No Project Alternative, new indirect

impacts to police protection are considered to be significant and greater than the impacts of the proposed project.

Adverse Indirect Impacts to Schools

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to create adverse indirect impacts to schools are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. As a result, the ability of local school districts to build new schools in the future to accommodate student population growth would likely be severely restricted because schools, which are defined as essential public services, qualify for offsets pursuant to Rule 1309.1. Consequently, under the No Project Alternative school districts would have to purchase credits on the open market, which could interfere with the school districts' ability to modernize, expand, or build new schools.

Consequently, under the No Project Alternative, new indirect impacts to schools are considered to be significant.

Adverse Indirect Impacts to Parks

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, create adverse indirect impacts to parks are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, there would be no newly constructed facilities in the future that could adversely affect parks as a result of implementing Alternative A. Parks do not typically require SCAQMD permits. For example, there are no pending permits for equipment located at parks identified in Appendix H. As a result, under the No Project Alternative potentially significant adverse indirect impacts that could occur to parks in the district would not be expected to occur after May 1 2012, and would be less than the significance determination for the proposed project.

Adverse Indirect Impacts to Other Public Facilities

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to create adverse indirect impacts to other public facilities are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, the ability of a number of types of public agencies to continue to efficiently provide services in the future to would likely be severely restricted.

As shown in Appendix H and the following bullet points, after May 1, 2012, the following types of public agencies could be adversely affected by the No Project Alternative: cities and county agencies, hospitals.

- Los Angeles International Airport has put on hold a project to replace boilers and gas turbines that would reduce emissions compared to existing equipment and generate electricity more efficiently.

- The Department of General Services of City of Los Angeles has put on hold a project to install an emergency generator for LNG fueling station. The net effect is that an LNG fueling station that would serve LNG vehicles replacing diesel-fueled vehicles is delayed.
- The Riverside County Department of Facilities Management has put on hold a project to install three generators. The effect of this delay is that there could be a lack of backup power that could affect health and safety services.
- Department of Public Works' Bureau of Sanitation for City of Los Angeles has put on hold a project to install an emergency generator at LNG/CNG fueling facility. The net effect is that an LNG fueling station that would serve LNG vehicles replacing diesel-fueled vehicles is delayed.
- There was a permit application from the City of Anaheim pending for the installation of a service station and gasoline storage and dispensing.
- The City of Claremont has submitted permit applications, which were pending for the following types of equipment: one boiler less than two million British thermal units per hour (MM BTU/Hr); three emergency backup internal combustion engines (ICE) (50-500 HP); and two emergency backup ICEs (greater than 500 HP). Emergency backup generators typically provide electricity to continue operations in the event of an electricity outage.
- There was a permit application from the City of Pacoima pending for the installation of a paint and solvent spray booth.
- There was a permit application from the City of Downey pending for the installation of one emergency backup ICE (greater than 500 HP).
- There was a permit application from the City of Westminster pending for the installation of one emergency backup ICE (greater than 500 HP).

Other examples of public service facilities that would be adversely affected after May 1, 2012, by the No Project Alternative are hospitals and medical services facilities. As shown in Appendix H and the following bullet points there were a number of pending permits for projects at hospitals that could adversely affect operations and care of patients at hospitals located in the district. Operations jeopardizing patient care in the future could become more acute in the future as existing equipment becomes inoperative, but no replacement equipment can be permitted.

- Permit applications from Providence Holy Cross Medical Center were on hold for the installation of replacement burners on two existing boilers, which are typically used

to provide heating, with new state of the art, cleaner burners. This project would not only reduce emissions, but would improve efficiency and reliability.

- Permit applications from Beach Cities Health District were on hold for the installation of three boilers to provide additional heat capacity to the health care district.
- Permit applications from Beckman Coulter, Inc. Medical Services were on hold for the installation of chemical synthesis, purification and drying systems.
- Permit applications from Diversified Silicone Products Inc. Medical Services were on hold for the installation of an oven used to manufacture medical industry products.
- Permit applications from GIP 7th Street Medical Services were on hold for the installation of three emergency backup generators for use during power outages to safeguard medical and other types of records.
- Permit applications from Glendale Adventist Medical Center were on hold for the installation of emergency generators to provide additional back-up power for use during power outages.
- Permit applications from Kaiser Permanente Ontario Vineyard Medical Center were on hold for the installation of a boiler to provide additional heat capacity for medical center.
- Permit applications from Paragon Labs, Natural Life Eco Vite Labs Medical Services were on hold for the installation of an oven and a mixer to manufacture dietary supplements.
- Permit applications from Rancho Specialty Hospital were on hold for the installation of emergency generator to provide additional back-up power for use during power outages.
- Permit applications from Varian Inc. Medical Services were on hold for the installation of an oven to manufacture chemical substances for medical/health testing.

As a result, under the No Project Alternative a number of types of public services is expected to be severely restricted after May 1, 2012. Further, as time goes by it is expected that the probability of existing permitted equipment reaching the end of its useful life will increase, interfering with city and county agencies' and hospitals' abilities to continue to provide heating, cooling and backup electricity. In the long term, it is expected that indirect impacts to new and existing public services providers from the No Project Alternative would be greater than for the proposed project.

Alternative B – Offset User Fees for Large Businesses

Adverse Indirect Impacts to Fire Protection

The survey of CEQA documents to evaluate the potential for fire protection impacts from the proposed project identified no primary facility categories that would significantly adversely affect fire protection. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse fire protection impacts, it was concluded that the proposed project would create significant adverse indirect impacts on fire protection.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts to fire protection compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, some emission reduction projects may include facilities that handle hazardous or flammable materials, which, in the event of an accidental release, could increase the demands on local fire departments to respond to hazardous materials releases or fires. Such projects include, but are not limited to installation of: alternative fuel refueling stations, biosolids energy production and phosphoric acid fuel cells.

For the above reasons, it is concluded that Alternative B would create significant adverse local fire department impacts greater than the proposed project. The contribution to cumulative impacts to local fire departments from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Adverse Indirect Impacts to Police Protection

The survey of CEQA documents to evaluate the potential for police protection impacts from the proposed project identified no primary facility categories that would significantly adversely affect police protection. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse police protection impacts, it was concluded that the proposed project would create significant adverse indirect impacts on police protection.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts compared to the proposed project. The main

difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, some emission reduction projects may include facilities that handle hazardous or flammable materials, which, in the event of an accidental release, could increase the demands on local police departments to assist local fire departments to respond to hazardous materials releases or fires. Such projects include, but are not limited to installation of: alternative fuel refueling stations, biosolids energy production, and phosphoric acid fuel cells.

For the above reasons, it is concluded that Alternative B would create significant adverse local police department impacts greater than the proposed project. The contribution to cumulative impacts to local police departments from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Adverse Indirect Impacts to Schools

The survey of CEQA documents to evaluate the potential impacts to schools from the proposed project identified no primary facility categories that would significantly adversely affect schools. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to schools, it was concluded that the proposed project would create significant adverse indirect impacts to schools in the district.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts to schools compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, some emission reduction projects may include facilities that handle hazardous or flammable materials, which, in the event of an accidental release, could adversely affect any nearby schools. As noted in item VIII. c., Alternative B has the potential result in locating future representative facilities and emission reduction projects that have the potential to emit hazardous materials within one-quarter mile of nearby schools. Such projects include, but are not limited to installation of: alternative fuel refueling stations, biosolids energy production and phosphoric acid fuel cells.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts to schools greater than the proposed project. The contribution to cumulative impacts to local schools from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined

effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Adverse Indirect Impacts to Parks

The survey of CEQA documents to evaluate the potential impacts to parks from the proposed project identified one primary facility category, entertainment/recreational facilities, that would significantly adversely affect parks. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to parks, it was concluded that the proposed project would create significant adverse indirect impacts to parks.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts to parks compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, some emission reduction projects may include facilities that handle hazardous or flammable materials, which, in the event of an accidental release, could adversely affect any nearby parks. Such projects include, but are not limited to installation of: alternative fuel refueling stations, biosolids energy production and phosphoric acid fuel cells.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts to parks greater than the proposed project. The contribution to cumulative impacts to parks from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Adverse Indirect Impacts to Other Public Facilities

The survey of CEQA documents to evaluate the potential impacts to other public facilities from the proposed project identified no primary facility categories that would significantly adversely affect other public facilities. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to other public facilities, it was concluded that the proposed project would create significant adverse indirect impacts to other public facilities.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts to other public facilities compared to the proposed project. The main difference between Alternative B and the proposed project

is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, some emission reduction projects may include facilities that handle hazardous or flammable materials, which, in the event of an accidental release, could adversely affect other public facilities. Such projects include, but are not limited to installation of: alternative fuel refueling stations, biosolids energy production and phosphoric acid fuel cells. In addition, to the extent that the category of other public facilities includes services related hazardous materials incidences, services and response times could also be adversely affected by Alternative B.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts to other public services greater than the proposed project. The contribution to cumulative impacts to other public facilities from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Alternative C –Large Businesses Prohibited from Accessing Rule 1304 Exemptions

Adverse Indirect Impacts to Fire Protection

The survey of CEQA documents to evaluate the potential for fire protection impacts from the proposed project identified no primary facility categories that would significantly adversely affect fire protection. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse fire protection impacts, it was concluded that the proposed project would create significant adverse indirect impacts on fire protection. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer impacts to local fire departments compared to the proposed project.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts to local fire departments. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative C. On balance, it is concluded that potential impacts to local fire departments from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts to local fire departments as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from

qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Adverse Indirect Impacts to Police Protection

The survey of CEQA documents to evaluate the potential for police protection impacts from the proposed project identified no primary facility categories that would significantly adversely affect police protection. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse police protection impacts, it was concluded that the proposed project would create significant adverse indirect impacts on police protection. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer impacts to local police departments compared to the proposed project.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts to local police departments. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative C. On balance, it is concluded that potential impacts to local police departments from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts to local police departments as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Adverse Indirect Impacts to Schools

The survey of CEQA documents to evaluate the potential impacts to schools from the proposed project identified no primary facility categories that would significantly adversely affect schools. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to schools, it was concluded that the proposed project would create significant adverse indirect impacts to schools. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer impacts to local schools compared to the proposed project.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts to local schools.

Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative C. On balance, it is concluded that potential impacts to local schools from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts to local schools from implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Adverse Indirect Impacts to Parks

The survey of CEQA documents to evaluate the potential impacts to parks from the proposed project identified one primary facility category, entertainment/recreational facilities, that would significantly adversely affect parks. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to parks, it was concluded that the proposed project would create significant adverse indirect impacts to parks. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer impacts to local parks compared to the proposed project.

Based upon the above information, potential impacts to local parks from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts to local parks as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Adverse Indirect Impacts to Other Public Facilities

The survey of CEQA documents to evaluate the potential impacts to other public facilities from the proposed project identified no primary facility categories that would significantly adversely affect other public facilities. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to other public facilities, it was concluded that the proposed project would create significant adverse indirect impacts to other public facilities. Because

fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer impacts to other public facilities compared to the proposed project.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts to other public facilities. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative C. On balance, it is concluded that potential impacts to other public facilities from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts to other public facilities as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Alternative D - Use of Credits Generated in 2009 and Beyond Only

Adverse Impacts to Fire Protection

The analysis of potential fire protection impacts as a result of implementing Alternative D is based on comparing the relative merits of this alternative with the proposed project. The survey of CEQA documents to evaluate the potential for fire protection impacts from the proposed project identified no primary facility categories that would significantly adversely affect fire protection. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse fire protection impacts, it was concluded that the proposed project would create significant adverse indirect impacts on fire protection. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts to fire protection.

However, as discussed under Alternative A limitations on the ability to modify or replace sources could also potentially result in adverse impacts to local fire departments. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative D.

Under Alternative D, existing offset accounts would be eliminated and only offsets from shutdowns of currently permitted sources obtaining offsets from SCAQMD offset accounts starting in the year 2009 would be available starting in the year 2010. As a result, offsets would only be available to for future replacement of existing fire protection facilities.

Offsets, however, would not be available for new facilities to accommodate population growth. This means that no new or expanded facilities for fire protection services could be built in the future.

Consequently, under Alternative D, adverse effects to fire services are considered to be significant and greater than the proposed project. The contribution to cumulative impacts also would be greater than the project's contribution.

Adverse Impacts to Police Protection

The survey of CEQA documents to evaluate the potential for police protection impacts from the proposed project identified no primary facility categories that would significantly adversely affect police protection. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse police protection impacts, it was concluded that the proposed project would create significant adverse indirect impacts on police protection. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts to police protection.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts to local police departments because of the inability to obtain permits for new or expanded police facilities.

Under Alternative D, existing offset accounts would be eliminated and only offsets from shutdowns of currently permitted sources obtaining offsets from SCAQMD offset accounts starting in the year 2009 would be available starting in the year 2010. As a result, offsets would only be available to for future replacement of existing police departments.

Offsets, however, would not be available for new facilities to accommodate population growth. This means that no new or expanded police protection services could be built in the future.

Consequently, under Alternative D, adverse effects to police protection services are considered to be significant and greater than the proposed project. The contribution to cumulative effects also would be greater than the project's contribution.

Adverse Impacts to Schools

The survey of CEQA documents to evaluate the potential impacts to schools from the proposed project identified no primary facility categories that would significantly

adversely affect schools. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to schools, it was concluded that the proposed project would create significant adverse indirect impacts to schools. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts to schools.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources to accommodate future growth could also potentially result in adverse impacts to local schools because fewer offsets would be available compared to the proposed project. As time goes by and population growth occurs, it is expected that the ability of school districts to expand or build new schools would be adversely affected. Consequently, under Alternative D, adverse effects to schools are considered to be significant and greater than the proposed project. The contribution to cumulative impacts also would be greater than the proposed project.

Adverse Impacts to Parks

The survey of CEQA documents to evaluate the potential impacts to parks from the proposed project identified one primary facility category, entertainment/recreational facilities, that would significantly adversely affect parks. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to parks, it was concluded that the proposed project would create significant adverse indirect impacts to parks. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts to parks.

Based upon the above information, indirect impacts from future projects that have the potential to adversely affect local or regional parks as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to adversely

affect local or regional parks, but indirect cumulative park facility impacts would be less than the proposed project.

Adverse Impacts to Other Public Facilities

The survey of CEQA documents to evaluate the potential impacts to other public facilities from the proposed project identified no primary facility categories that would significantly adversely affect other public facilities. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to other public facilities, it was concluded that the proposed project would create significant adverse indirect impacts to other public facilities. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts to other public facilities.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources to accommodate future growth could also potentially result in adverse impacts to other public facilities because fewer offsets would be available compared to the proposed project.

As time goes by and population growth occurs, it is expected that the ability of public services agencies to continue providing services at the same level they currently provide would be adversely affected. Consequently, under Alternative D, adverse effects to public agency services from the inability to obtain permits to expand existing services or build new facilities to accommodate population growth are considered to be significant and greater than the proposed project. The contribution to cumulative impacts also would be greater than the proposed project.

Alternative E – Limited Offset Availability

Adverse Impacts to Fire Protection

The survey of CEQA documents to evaluate the potential for fire protection impacts from the proposed project identified no primary facility categories that would significantly adversely affect fire protection. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse fire protection impacts, it was concluded that the proposed project would create significant adverse indirect impacts on fire protection. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts to fire protection.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts to fire protection services.

Under Alternative E, existing offset accounts would contain 50 percent of the number of offsets from growth compared to the proposed project, although Alternative E would contain the same number of offsets from shutdowns of currently permitted sources obtaining offsets from SCAQMD offset accounts (see Tables 6-100 and 6-101 in Chapter 6). This means that fewer offsets would be available in the future under Alternative E compared to the proposed project. As a result, fewer offsets would be available for future expansion of existing fire protection services to accommodate future population growth.

Consequently, under Alternative E, adverse effects to fire services are considered to be significant and greater than the proposed project. The contribution to cumulative impacts also would be greater than the proposed project.

Adverse Impacts to Police Protection

The survey of CEQA documents to evaluate the potential for police protection impacts from the proposed project identified no primary facility categories that would significantly adversely affect police protection. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse police protection impacts, it was concluded that the proposed project would create significant adverse indirect impacts on police protection in the district. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts to police protection.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts to local police departments because of the inability to obtain permits for new or expanded police facilities.

Under Alternative E, existing offset accounts would contain 50 percent of the number of offsets from growth compared to the proposed project, although Alternative E would contain the same number of offsets from shutdowns of currently permitted sources obtaining offsets from SCAQMD offset accounts (see Tables 6-100 and 6-101 in Chapter 6). As a result, fewer offsets would be available for future new or expanded police services to accommodate future population growth.

Consequently, under Alternative E, adverse effects to police protection services are considered to be significant and greater than the proposed project. The contribution to cumulative impacts also would be greater than the proposed project.

Adverse Impacts to Schools

The survey of CEQA documents to evaluate the potential impacts to schools from the proposed project identified no primary facility categories that would significantly adversely affect schools. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to schools, it was concluded that the proposed project would create significant adverse indirect impacts to schools. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts to schools.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources to accommodate future growth could also potentially result in adverse impacts to local schools because fewer offsets would be available compared to the proposed project.

As time goes by and population growth occurs, it is expected that the ability of school districts to expand or build new schools would be adversely affected. Consequently, under Alternative E, adverse effects to schools are considered to be significant and greater than the proposed project. The contribution to cumulative impacts also would be greater than the proposed project.

Adverse Impacts to Parks

The survey of CEQA documents to evaluate the potential impacts to parks from the proposed project identified one primary facility category, entertainment/recreational facilities, that would significantly adversely affect parks. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to parks, it was concluded that the proposed project would create significant adverse indirect impacts to parks. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts to parks.

Indirect adverse impacts to parks from implementing Alternative E would be less than indirect adverse impacts to parks from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect adverse impacts to parks from Alternative E would be significant, but less compared to the

proposed project. Similarly, the contribution to cumulative adverse impacts to parks from implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Adverse Impacts to Other Public Facilities

The survey of CEQA documents to evaluate the potential impacts to other public facilities from the proposed project identified no primary facility categories that would significantly adversely affect other public facilities. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to other public facilities, it was concluded that the proposed project would create significant adverse indirect impacts to other public facilities. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts to other public facilities.

Indirect adverse impacts to other public facilities from implementing Alternative E would be less than indirect adverse impacts to other public facilities from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources to accommodate future growth could also potentially result in adverse impacts to other public facilities because fewer offsets would be available compared to the proposed project.

As time goes by and population growth occurs, it is expected that the ability of public services agencies to continue providing services at the same level they currently provide would be adversely affected. Consequently, under Alternative E, adverse effects to public agency services from the inability to obtain permits to expand existing services or build new facilities to accommodate population growth are considered to be significant and greater than the proposed project. The contribution to cumulative impacts also would be greater than the proposed project.

Recreation

Proposed Project

In the NOP/IS for the proposed project, it was concluded that the proposed project would not generate significant adverse recreation impacts. The rationale for this conclusion was as follows. The proposed project would not directly result in an increase in the use of existing neighborhood and regional parks or other recreational facilities, or include recreational facilities, or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. With regard to the new development projects, the proposed project was determined (in the NOP/IS) to have no affect on population growth in the district, therefore, no direct or indirect effects on recreation or recreational opportunities are foreseen as a result of implementing the proposed project.

The analysis in Subsection 5.14 concludes that the proposed project has the potential to create significant adverse impacts. Mitigation of recreation impacts would be the responsibility of the public agency (e.g., city or county) that would serve as lead agency on any given future project. Since the SCAQMD cannot predict how a future lead agency might choose to mitigate a particular significant recreation impact, the potential exists for future indirect impacts to be significant and unavoidable (i.e., significant even after mitigation).

Increased Use of Neighborhood Parks

The survey of the 52 CEQA documents shown in Table 5.15-1 revealed that entertainment/recreation facilities (document #21) have the potential to create significant adverse indirect impacts as a result of increased use of neighborhood parks. The CEQA documents for the remaining primary facility categories: agricultural facilities; retail/services facilities; large commercial facilities; institutional facilities; utility facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse indirect impacts to parks. Based on the results of the CEQA document survey and the possibility that future individual projects in all of these facility categories could adversely affect parks through increased use, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental topic area.

Require Construction of Neighborhood Parks

The survey of the 52 CEQA documents shown in Table 5.15-1 revealed that entertainment/recreation facilities (document #21) have the potential to create significant adverse indirect impacts resulting from construction of neighborhood parks. The CEQA documents for the remaining primary facility categories: agricultural facilities; retail/services facilities; large commercial facilities; institutional facilities; utility

facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse indirect impacts from construction of neighborhood parks. Based on the results of the CEQA document survey and the possibility that future individual projects in all of these facility categories could require construction of neighborhood parks, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental topic area.

Cumulative Impacts

Project impacts to recreation could combine with impacts from other past, present and future projects, including projects permitted under SB 827, projects permitted in reliance on ERC's and new power plants entitled to receive offsets pursuant to state law. It is concluded that the proposed project would make a cumulatively considerable contribution to significant cumulative impacts to recreation.

Alternative A - No Project Alternative

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, recreation impacts are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, as noted in the "Population and Housing" discussion above, there would be no newly constructed facilities in the future that could induce population growth in the district compared to the proposed project that could adversely affect recreational facilities. As a result, under the No Project Alternative potentially significant adverse indirect impacts to recreational facilities that could occur from inducing population growth in the district would not be expected to occur after May 1 2012, and would be less than the significance determination for the proposed project.

Increased Use of Neighborhood Parks

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the

issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to increase the use of neighborhood parks are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. As noted in the "Population and Housing" discussion above, there would be no newly constructed facilities in the future that could indirectly induce population growth in the district that could result in increased use of neighborhood parks. Similarly, construction of neighborhood parks does not typically require SCAQMD permits. For example, there are no pending permits for equipment located at neighborhood parks identified in Appendix H. As a result, under the No Project Alternative potentially significant adverse indirect impacts that could occur from constructing neighborhood parks in the district would not be expected to occur after May 1, 2012, would be less than the significance determination for the proposed project.

Require Construction of Neighborhood Parks

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to require construction of neighborhood parks are considered to be significant. Starting May 1, 2012, new future facilities that previously had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. As noted in the "Population and Housing" discussion above, there would be no newly constructed facilities in the future that could indirectly induce population growth in the district that

could require construction of neighborhood parks. Similarly, construction of neighborhood parks does not typically require SCAQMD permits. For example, there are no pending permits for equipment located at neighborhood parks identified in Appendix H. As a result, under the No Project Alternative potentially significant adverse indirect impacts that could occur from constructing neighborhood parks in the district would not be expected to occur after May 1 2012, and would be less than the significance determination for the proposed project.

Alternative B – Offset User Fees for Large Businesses

Increased Use of Neighborhood Parks

The survey of CEQA documents to evaluate the potential impacts from an increased use of neighborhood parks from the proposed project identified one primary facility category, entertainment/recreational facilities, that would significantly adversely increase use of neighborhood parks. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from an increased use of neighborhood parks, it was concluded that the proposed project would create significant adverse indirect impacts from an increased use of neighborhood parks.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to increase the use of neighborhood parks compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, some emission reduction projects may include the installation of renewable energy projects, which could contribute to the local infrastructure and, therefore, induce population growth, which has the potential to increase the use of neighborhood parks. Such projects include, but are not limited to: wind turbines, solar collector facilities and biosolids energy production.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts from increasing the use of neighborhood parks greater than the proposed project. The contribution to cumulative population growth impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Require Construction of Neighborhood Parks

The survey of CEQA documents to evaluate the potential impacts from requiring construction of neighborhood parks from the proposed project identified one primary facility category, entertainment/recreational facilities, that would significantly require construction of neighborhood parks. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from requiring construction of neighborhood parks, it was concluded that the proposed project would create significant adverse indirect impacts from requiring construction of neighborhood parks.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to increase the use of neighborhood parks compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, some emission reduction projects may include the installation of renewable energy projects, which could contribute to the local infrastructure and, therefore, induce population growth, resulting in the need to construct new neighborhood parks. Such projects include, but are not limited to: wind turbines, solar collector facilities and biosolids energy production.

For the above reasons, requiring construction of neighborhood parks, it is concluded that Alternative B would create significant adverse indirect impacts as a result of the need to construct new neighborhood parks greater than the proposed project. The contribution to cumulative impacts as a result of constructing new neighborhood parks from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Alternative C –Large Businesses Prohibited from Accessing Rule 1304 Exemptions

Increased Use of Neighborhood Parks

The survey of CEQA documents to evaluate the potential impacts from an increased use of neighborhood parks from the proposed project identified one primary facility category, entertainment/recreational facilities, which would significantly adversely increase use of neighborhood parks. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from an increased use of neighborhood parks, it was concluded that the

proposed project would create significant adverse indirect impacts from an increased use of neighborhood parks. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer impacts as a result of future affected facilities inducing population growth, resulting in the increased usage of neighborhood parks compared to the proposed project.

Based upon the above information, there would be significant, but fewer or less significant potential impacts as a result of future affected facilities inducing population growth, resulting in the increased usage of neighborhood parks from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts as a result of future affected facilities inducing population growth, resulting in the increased usage of neighborhood parks from implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for exemptions pursuant to Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Require Construction of Neighborhood Parks

The analysis of potential impacts from requiring construction of neighborhood parks as a result of implementing Alternative C is based on comparing the relative merits of this alternative with the proposed project. The survey of CEQA documents to evaluate the potential impacts from requiring construction of neighborhood parks from the proposed project identified one primary facility category, entertainment/recreational facilities, which would significantly require construction of neighborhood parks. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from requiring construction of neighborhood parks, it was concluded that the proposed project would create significant adverse indirect impacts from requiring construction of neighborhood parks. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer impacts as a result of future affected facilities inducing population growth, resulting in the need to construct neighborhood parks compared to the proposed project.

Based upon the above information, there would be fewer or less significant potential impacts as a result of future affected facilities inducing population growth, resulting in the need to construct neighborhood parks from implementing Alternative C compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contributions to cumulative indirect impacts as a result of future affected facilities inducing population growth, resulting in the need to construct neighborhood parks from implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large

businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Alternative D - Use of Credits Generated in 2009 and Beyond Only

Increased Use of Neighborhood Parks

The survey of CEQA documents to evaluate the potential impacts from an increased use of neighborhood parks from the proposed project identified one primary facility category, entertainment/recreational facilities, which would significantly adversely increase use of neighborhood parks. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from an increased use of neighborhood parks, it was concluded that the proposed project would create significant adverse indirect impacts from an increased use of neighborhood parks. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of increased use of neighborhood parks.

Based upon the above information, indirect impacts from future projects that have the potential to increase the use of neighborhood parks as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to increase the use of neighborhood parks, but indirect cumulative neighborhood park impacts would be less than the proposed project.

Require Construction of Neighborhood Parks

The survey of CEQA documents to evaluate the potential impacts from requiring construction of neighborhood parks from the proposed project identified one primary facility category, entertainment/recreational facilities, which would significantly require construction of neighborhood parks. For this reason and the possibility that future

individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from requiring construction of neighborhood parks, it was concluded that the proposed project would create significant adverse indirect impacts from requiring construction of neighborhood parks. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of requiring construction of neighborhood parks.

Based upon the above information, indirect impacts from future projects that have the potential to induce population growth as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to induce population growth, thus, requiring the construction of neighborhood parks, but indirect cumulative neighborhood park impacts would be less than the proposed project.

Alternative E – Limited Offset Availability

Increased Use of Neighborhood Parks

The survey of CEQA documents to evaluate the potential impacts from an increased use of neighborhood parks from the proposed project identified one primary facility category, entertainment/recreational facilities, which would significantly adversely increase use of neighborhood parks. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from an increased use of neighborhood parks, it was concluded that the proposed project would create significant adverse indirect impacts from an increased use of neighborhood parks. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of increased use of neighborhood parks.

Indirect impacts from future facilities that have the potential to increase the use of neighborhood parks as a result of implementing Alternative E would be less than indirect

neighborhood park impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect neighborhood park impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to increase the use of neighborhood parks as a result of implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Require Construction of Neighborhood Parks

The survey of CEQA documents to evaluate the potential impacts from requiring construction of neighborhood parks from the proposed project identified one primary facility category, entertainment/recreational facilities, which would significantly require construction of neighborhood parks. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from requiring construction of neighborhood parks, it was concluded that the proposed project would create significant adverse indirect impacts from requiring construction of neighborhood parks. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of requiring construction of neighborhood parks.

Indirect impacts from future facilities that have the potential to require construction of neighborhood parks as a result of implementing Alternative E would be less than indirect neighborhood park construction impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect neighborhood park construction impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to require construction of neighborhood parks as a result of implementing Alternative E would be significant,

but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Solid/Hazardous Wastes

Proposed Project

The NOP/IS prepared for the proposed project indicated that it has the potential to generate significant adverse solid/hazardous wastes impacts for the following reasons. The proposed project could allow the development of individual projects that qualify to receive emissions offsets available from the SCAQMD's internal accounts. These individual projects could result in impacts on solid/hazardous waste by increasing the generation of solid waste such that the daily permitted capacity of the regional landfills are exceeded.

The analysis in Subchapter 5.15 concludes that the proposed project has the potential to create significant adverse impacts. Mitigation of noise impacts would primarily be the responsibility of the local agency (e.g., city or county) that would serve as lead agency on any given future project. Since the SCAQMD cannot predict how a future lead agency might choose to mitigate a particular significant solid/hazardous wastes impact, the potential exists for future indirect impacts to be significant and unavoidable (i.e., significant even after mitigation).

Have Sufficient Landfill Capacity to Accommodate Project

The survey of the 52 CEQA documents shown in Table 5.16-1 revealed that retail/services facilities (document #5); large commercial facilities (documents #11 and #17); and institutional facilities (document #33) have the potential to create significant adverse indirect impacts as a result of insufficient landfill capacity to accommodate projects. The CEQA documents for the remaining primary facility categories: agricultural facilities; entertainment/recreational facilities; transportation facilities; utility facilities; light industrial/warehouse facilities; and heavy industrial projects, did not identify significant adverse indirect impacts to parks. Based on the results of the CEQA document survey and the possibility that future individual projects in all of these facility categories could adversely affect parks, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental topic area.

Comply with Regulations Regarding Solid/Hazardous Wastes

The survey of the 52 CEQA documents shown in Table 5.16-1 revealed that no primary facility categories were shown to violate regulations regarding solid/hazardous wastes. However, SCAQMD staff acknowledges that the survey of CEQA documents used for

this analysis represents a snapshot in time. Further, since future individual projects in the nine facility categories could generate other changes that could result in facilities violating regulations regarding solid/hazardous wastes in the future from a variety of facility categories that obtain offsets from the SCAQMD's internal account, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Cumulative Impacts

Project impacts to solid or hazardous wastes could combine with impacts from other past, present and future projects, including projects permitted under SB 827, projects permitted in reliance on ERC's and new power plants entitled to receive offsets pursuant to state law. It is concluded that the proposed project would make a cumulatively considerable contribution to significant cumulative impacts to solid or hazardous waste.

Alternative A - No Project Alternative

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under the No Project Alternative, it is assumed that facilities that previously relied on access to the SCAQMD's internal accounts in the past to demonstrate equivalency with federal offset requirements, through either Rule 1304 or Rule 1309.1, would no longer have access to those offsets after May 1, 2012, when applying for a permit for new or modified equipment. As a result, the analysis in this PEA assumes that no facilities that previously obtained credits pursuant to Rules 1304 or 1309.1 would be built after May 1, 2012.

After May 1, 2012, other indirect may be generated because of the inability to approve permits for future facilities that previously would have accessed the SCAQMD's internal accounts would result in existing facilities' inability to replace existing equipment beyond its useful lifetime or install new equipment to further accommodate population growth. Similarly, new facilities could not be constructed.

Have Sufficient Landfill Capacity to Accommodate Project

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the

issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to create insufficient landfill capacity to accommodate the projects are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, no projects that previously qualified for offsets pursuant to Rules 1304 or 1309.1 would be constructed and operated at landfills in the future in the district when compared against the proposed project.

New and existing landfills are subject to SCAQMD Rule 1150.1 – Control of Gaseous Emissions from Municipal Solid Waste Landfills, which generally requires landfill gas collection and control systems. Since most equipment has a useful lifetime duration, at some point in the future existing equipment would be expected to experience breakdowns and other types of failures that could cause accidental releases of hazardous material, especially equipment that has already been in operation for a number of years. Under this scenario, unless collection and control equipment could be replaced or modified, landfills would increasingly violate Rule 1150.1.

As can be seen in Appendix H, under the permit moratorium that ended as of January 1, 2010, there were pending permit applications for:

- gas collection systems and flares at landfills in Thousand Palms and Rubidoux;
- a gas collection system and flare at landfill in Corona; and
- a gas collection system and flare at a landfill in Carson.

Further, under the No Project Alternative existing landfills could no longer expand and new landfills could no longer be developed in the district. Therefore, in order to accommodate future population growth, municipal and solid wastes would likely have to be transported out the district, resulting in potential transportation and air quality impacts.

As can be seen in Appendix H, under the permit moratorium that ended as of January 1, 2010, there were pending permit applications for:

- five electrical generating engines at a landfill in Irvine;
- electrical generating engines at a landfill in Rolling Hills Estates;
- electrical generating engines at a landfill in West Covina;
- replacement of an old, inefficient boiler with a more efficient boiler to generate steam at a landfill in Fountain Valley;
- electrical generating engines at a landfill in Brea;
- electrical generating engines at a landfill in Sylmar, and
- one other miscellaneous permit application for equipment at a fire station.

In the long term, it is expected that impacts to landfills' ability to accommodate future waste capacity under the No Project Alternative would be significant and greater than the proposed project because future installation of new collection and control systems or modifications/expansions of existing landfill collection and control systems would not occur.

Comply with Regulations Regarding Solid/Hazardous Wastes

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to violate regulations regarding solid or hazardous wastes are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, there would be no newly constructed facilities in the future that could adversely affect a facility's ability to comply with regulations regarding solid or hazardous wastes compared to the proposed project. In the long term, it is expected that impacts in terms of compliance with regulations regarding solid or hazardous wastes,

under the No Project Alternative would be significant and greater than the proposed project.

Alternative B – Offset User Fees for Large Businesses

Have Sufficient Landfill Capacity to Accommodate Project

The survey of CEQA documents to evaluate the potential impacts to landfill capacity from the proposed project identified the following primary facility categories that would significantly adversely affect landfill capacity: retail/services facilities, large commercial facilities and institutional facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to landfill capacity, it was concluded that the proposed project would create significant adverse indirect impacts to landfill capacity.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to overwhelm existing landfill capacities in the district compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, some emission reduction projects may have the potential to increase solid or hazard wastes requiring disposal, which could adversely affect the capacity of landfills to accommodate such waste increases. Such projects include, but are not limited to installation of: biosolids energy production, phosphoric acid fuel cells and replacement of conventional lawn and garden equipment with electric equipment.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts to landfills as a result of insufficient capacity to accommodate future projects greater than the proposed project. The contribution to cumulative impacts to local landfills from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Comply with Regulations Regarding Solid/Hazardous Wastes

The survey of CEQA documents to evaluate the potential impacts from future projects violating with solid and/or hazardous waste regulations from the proposed project identified no primary facility categories that would significantly adversely violate solid and/or hazardous waste regulations. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts

from future projects violating solid and/or hazardous waste regulations, it was concluded that the proposed project would create significant adverse indirect impacts from future projects violating solid and/or hazardous waste regulations.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to violate regulations regarding solid or hazardous wastes compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, some emission reduction projects may have the potential to increase solid or hazard wastes requiring disposal, which could result in violations of applicable solid or hazardous waste regulations. Such projects include, but are not limited to installation of: biosolids energy production, phosphoric acid fuel cells and replacement of conventional lawn and garden equipment with electric equipment.

For the above reasons, it is concluded that Alternative B would create significant adverse indirect impacts future projects violating solid or hazardous waste regulations greater than the proposed project. The contribution to cumulative impacts as a result of future affected facilities violating waste regulations from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Alternative C –Large Businesses Prohibited from Accessing Rule 1304 Exemptions

Have Sufficient Landfill Capacity to Accommodate Project

The survey of CEQA documents to evaluate the potential impacts to landfill capacity from the proposed project identified the following primary facility categories that would significantly adversely affect landfill capacity: retail/services facilities, large commercial facilities and institutional facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to landfill capacity, it was concluded that the proposed project would create significant adverse indirect impacts to landfill capacity. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer solid or hazardous waste impacts as a result of local landfills having insufficient landfill capacity to accommodate wastes from future affected facilities compared to the proposed project.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts as a result of local

landfills having insufficient landfill capacity. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative C. On balance, it is concluded that potential solid or hazardous waste impacts as a result of local landfills having insufficient landfill capacity to accommodate wastes from future affected facilities as a result of implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect solid or hazardous waste impacts as a result of local landfills having insufficient landfill capacity to accommodate the wastes from future affected facilities as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Comply with Regulations Regarding Solid/Hazardous Wastes

survey of CEQA documents to evaluate the potential impacts from future projects violating with solid and/or hazardous waste regulations from the proposed project identified no primary facility categories that would significantly adversely violate solid and/or hazardous waste regulations. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects violating solid and/or hazardous waste regulations, it was concluded that the proposed project would create significant adverse indirect impacts from future projects violating solid and/or hazardous waste regulations. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer impacts as a result of future affected facilities violating solid or hazardous waste regulations compared to the proposed project.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts as a result of future affected facilities violating solid or hazardous waste regulations. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative C. On balance, it is concluded that potential impacts as a result of future affected facilities violating solid or hazardous waste regulations from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts as a result of future affected facilities violating solid or hazardous waste regulations from implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying

for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Alternative D - Use of Credits Generated in 2009 and Beyond Only

Have Sufficient Landfill Capacity to Accommodate Project

The survey of CEQA documents to evaluate the potential impacts to landfill capacity from the proposed project identified the following primary facility categories that would significantly adversely affect landfill capacity: retail/services facilities, large commercial facilities and institutional facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to landfill capacity, it was concluded that the proposed project would create significant adverse indirect impacts to landfill capacity. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of having sufficient landfill capacity to accommodate the project.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts from future projects that have the potential to contribute to insufficient landfill capacity.

The reasons fewer offsets would be available are because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements.

Offsets, however, would not be available for new landfills to accommodate population growth. As can be seen in Appendix H, under the permit moratorium that ended as of January 1, 2010, there were 10 pending permit applications for equipment at landfills including landfill gas collection systems, flares, landfill condensate collection, etc., necessary for landfill operations. If offsets for essential public services are restricted, landfills could not expand and new landfills could not be built.

As time goes by it is expected that restrictions on the ability to expand or build new landfills would adversely affect sanitation districts' ability to provide refuse disposal in the future to accommodate population growth. Consequently, under Alternative D, adverse effects to landfills and landfill capacities in the future are considered to be significant and greater than the proposed project. The contribution to cumulative impacts is also greater than the proposed project.

Comply with Regulations Regarding Solid/Hazardous Wastes

The survey of CEQA documents to evaluate the potential impacts to landfill capacity from the proposed project identified the following primary facility categories that would significantly adversely affect landfill capacity: retail/services facilities, large commercial facilities and institutional facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to landfill capacity, it was concluded that the proposed project would create significant adverse indirect impacts to landfill capacity. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of compliance with regulations regarding solid or hazardous wastes.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts from future projects that have the potential to result in violations of regulations regarding solid or hazardous wastes. In the long term, it is expected that impacts in terms of compliance with regulations regarding solid or hazardous wastes, under Alternative D would be significant and greater than the impacts of the proposed project. The contribution to cumulative impacts is also greater than the proposed project.

Alternative E – Limited Offset Availability

Have Sufficient Landfill Capacity to Accommodate Project

The survey of CEQA documents to evaluate the potential impacts to landfill capacity from the proposed project identified the following primary facility categories that would significantly adversely affect landfill capacity: retail/services facilities, large commercial facilities and institutional facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to landfill capacity, it was concluded that the proposed project would create significant adverse indirect impacts to landfill capacity. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of having sufficient landfill capacity to accommodate the project.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts from future facilities that have the potential to create insufficient landfill capacity.

As can be seen in Appendix H, under the permit moratorium that ended as of January 1, 2010, there were 10 pending permit applications for equipment at landfills including landfill gas collection systems, flares, landfill condensate collection, etc., necessary for

landfill operations. If offsets for essential public service are restricted, landfills could not expand and new landfills could not be built.

As time goes by it is expected that restrictions on the ability to expand or build new landfills would adversely affect sanitation districts' ability to provide refuse disposal in the future to accommodate population growth. Consequently, under Alternative E, adverse effects to landfills and landfill capacities in the future are considered to be significant and greater than the proposed project. The contribution to cumulative impacts is also greater than the proposed project.

Comply with Regulations Regarding Solid/Hazardous Wastes

The survey of CEQA documents to evaluate the potential impacts to landfill capacity from the proposed project identified the following primary facility categories that would significantly adversely affect landfill capacity: retail/services facilities, large commercial facilities and institutional facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts to landfill capacity, it was concluded that the proposed project would create significant adverse indirect impacts to landfill capacity. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of compliance with regulations regarding solid or hazardous wastes.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts from future facilities that have the potential to violate solid or hazardous waste regulations. In the long term, it is expected that impacts in terms of compliance with regulations regarding solid or hazardous wastes, under the Alternative E would be significant and greater than the impacts of the proposed project. The contribution to cumulative impacts is also greater than the proposed project.

Transportation/Traffic

Proposed Project

The NOP/IS prepared for the proposed project indicated that it has the potential to generate significant adverse transportation/traffic impacts for the following reasons. The proposed project could allow the development of individual projects that qualify to receive emissions offsets available from the SCAQMD's internal accounts. Typical impacts from individual projects could include an increase in vehicle trips leading to congestion and deterioration in the levels of service for the adjacent streets and intersections in the vicinity of each individual project. The projects could also result in inclusion of inadequate design features and incompatible uses that affect traffic

operations and safety, and affect emergency access due to design features and traffic congestion.

The analysis in Subsection 5.16 concludes that the proposed project has the potential to create significant adverse impacts. Mitigation of transportation/traffic impacts would be the responsibility of the public agency (e.g., city or county) that would serve as lead agency on any given future project. Since the SCAQMD cannot predict how a future lead agency might choose to mitigate a particular significant transportation/traffic impact, the potential exists for future indirect impacts to be significant and unavoidable (i.e., significant even after mitigation).

Cause a Substantial Increase in Traffic

The survey of the 52 CEQA documents shown in Table 5.17-1 revealed that retail/services facilities (documents #5, #7, #8, and #10); large commercial facilities (documents #11, #12, #16, #17, #18, and #19); entertainment/recreational facilities (documents #20 and #21); institutional facilities (documents #25, #26, #28, #34, #35, and #37); light industrial/warehouse facilities (documents #46, #48, and #49); and heavy industrial facilities (document #50) have the potential to create significant adverse indirect impacts from facilities substantially increasing traffic. The CEQA documents for the remaining primary facility categories: agricultural facilities; transportation facilities; and utility facilities did not identify significant adverse indirect impacts from substantial increases in traffic. Based on the results of the CEQA document survey and the possibility that future individual projects in all of these facility categories could cause substantial increases in traffic, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental topic area.

Individually or Cumulatively Exceed Level of Service (LOS) Standards

The survey of the 52 CEQA documents shown in Table 5.17-1 revealed that agricultural facilities (document #1); retail/services facilities (documents #5 and #8); large commercial facilities (documents #11 and #17); entertainment/recreational facilities (documents #20 and #21); light industrial/warehouse facilities (documents #46 and #48); have the potential to individually or cumulatively exceed LOS standards. The CEQA documents for the remaining primary facility categories: institutional facilities; transportation facilities; utility facilities; and heavy industrial facilities did not identify significant adverse indirect impacts from substantial increases in traffic. Based on the results of the CEQA document survey and the possibility that future individual projects in all of these facility categories could individually or cumulatively exceed LOS standards, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental topic area.

Change Air Traffic Patterns

The survey of the 52 CEQA documents shown in Table 5.17-1 revealed that no primary facility categories were shown to change air traffic patterns. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in the nine facility categories could generate other changes that could change air traffic patterns in the future from a variety of facility categories that obtain offsets from the SCAQMD's internal account and, using an abundance of caution, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Increase Road Hazards

The survey of the 52 CEQA documents shown in Table 5.17-1 revealed that large commercial facilities (document #17); light industrial/warehouse facilities (documents #46 and #48); and utility facilities (document #43) have the potential to increase road hazards. The CEQA documents for the remaining primary facility categories: agricultural facilities; retail/services facilities; entertainment/recreational facilities; institutional facilities; transportation facilities; and heavy industrial facilities did not identify significant adverse indirect impacts from substantial increases in road hazards. Based on the results of the CEQA document survey and the possibility that future individual projects in all of these facility categories could increase road hazards, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental topic area.

Result in Inadequate Emergency Access

The survey of the 52 CEQA documents shown in Table 5.17-1 revealed that no primary facility categories were shown to result in inadequate emergency access. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in the nine facility categories could generate other changes that could result in inadequate emergency access in the future from a variety of facility categories that obtain offsets from the SCAQMD's internal account, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Result in Inadequate Parking

The survey of the 52 CEQA documents shown in Table 5.17-1 revealed that large commercial facilities (document #17) and heavy industrial facilities (document #50)

have the potential to result in inadequate parking. The CEQA documents for the remaining primary facility categories: agricultural facilities; retail/services facilities; entertainment/recreational facilities; institutional facilities; transportation facilities; utility facilities; and light industrial/warehouse facilities did not identify significant adverse indirect impacts from projects that result in inadequate parking. Based on the results of the CEQA document survey and the possibility that future individual projects in all of these facility categories could result in inadequate parking, it was concluded that the proposed project would create significant adverse indirect impacts to this environmental topic area.

Conflict with Alternative Transportation Policies

The survey of the 52 CEQA documents shown in Table 5.17-1 revealed that no primary facility categories were shown to conflict with alternative transportation policies. However, SCAQMD staff acknowledges that the survey of CEQA documents used for this analysis represents a snapshot in time. Further, since future individual projects in the nine facility categories could generate other changes that could conflict with alternative transportation policies in the future from a variety of facility categories that obtain offsets from the SCAQMD's internal account and, the analysis concluded that the proposed project has the potential to create significant adverse indirect impacts to this environmental category.

Cumulative Impacts

Project impacts to transportation or traffic could combine with impacts from other past, present and future projects, including projects permitted under SB 827, projects permitted in reliance on ERC's and new power plants entitled to receive offsets pursuant to state law. It is concluded that the proposed project would make a cumulatively considerable contribution to significant cumulative impacts to transportation or traffic.

Alternative A - No Project Alternative

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

After May 1, 2012, a permit moratorium would likely be implemented and continue into the future. Under the No Project Alternative, it is assumed that facilities that previously relied on access to the SCAQMD's internal accounts in the past to demonstrate

equivalency with federal offset requirements, through either Rule 1304 or Rule 1309.1, would no longer have access to those offsets when applying for a permit for new or modified equipment after May 1, 2012. As a result, the analysis in this PEA assumes that no future new or modified facilities that previously obtained credits pursuant to Rules 1304 or 1309.1 would be built after May 1, 2012.

After May 1, 2012, however, other indirect impacts may be generated because of the inability to approve permits for future facilities that previously would have accessed the SCAQMD's internal accounts would result in existing facilities' inability to replace existing equipment beyond its useful lifetime or install new equipment to further accommodate population growth. Similarly, new facilities could not be constructed. As a result, increased traffic could occur in the district because people may have to driver farther to obtain services if nearby services have to close down and there would be an increase in commercial and industrial products that would need to be imported into the district.

Cause a Substantial Increase in Traffic

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, after May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, increased traffic could occur in the district because people may have to driver farther to obtain services if nearby services have to close down and there would be an increase in commercial and industrial products that would need to be imported into the district.

Under the No Project Alternative after May 1, 2012, existing equipment would be expected to operate indefinitely into the future without replacement or modification because of the permit moratorium. Since most equipment has a useful lifetime duration, at some point in the future existing equipment would be expected to experience breakdowns and other types of failures that could diminish the manufacturing capacity of commercial and industrial facilities in the district, especially from equipment that has already been in operation for a number of years. Consequently, in the long term vehicle miles traveled (VMT), trip rates, and congestion in the district could increase as a result of importing commercial and industrial goods into the district.

As can be seen in Appendix H, under the permit moratorium that temporarily ended as of January 1, 2010, there were pending permit applications for a wide variety of manufacturing and industrial facilities. To accommodate future population growth in the district, it is expected that under the No Project Alternative a large portion of the commercial and industrial products would be manufactured outside of the district and imported into the district. The following provides an overview of the types of commercial and industrial facilities that would be adversely affected under the No Project Alternative after May 1, 2012.

- There were seven pending permit applications for aerospace operations such as tank plating, solder leveling, abrasive blasting that could affect the ability of aerospace operations to continue operating in the district in the future.
- There were five pending permit applications for aggregate operations, which generally supply aggregate materials to build roads, construct buildings, etc.
- There were 67 pending permit applications for auto body shops, primarily for spray booths used to coat vehicle body work after auto body repair.
- There were 10 pending permit applications for auto repair shops.
- There were 136 pending permit applications for coating operations. Although the specific type of coating operation is not listed, this category would typically include spray booths for wood furniture coatings, metal parts coatings, plastics coatings, etc.
- There were four pending permit applications for concrete batch plants.
- There were 41 pending permit applications for construction services, which include, but are not limited to, a variety of services such as: concrete batch/blending services equipment, asphalt batch/blending services, tank degassing, etc.
- There were seven pending permit applications for crematory ovens or other equipment at crematoriums.
- There were 21 pending permit applications for gas fueling and dispensing stations, which consists primarily of gas station storing and dispensing of fuels, gas station soil remediation projects, etc.
- There were 224 pending permit applications for manufacturing operations, which include a variety of operations including, but not limited to: car care products, cosmetics, electronic components, foam products, food products, industrial vehicles, lawn and garden products, metal products, piping, plastic, rubber, steel, etc.
- There were 127 pending permit applications for petroleum operations, which include a variety of operations including, but not limited to: petroleum products storage

tanks, bulk petroleum products loading and unloading facilities, petroleum products distillation equipment, soil remediation projects, etc.

- There were 46 pending permit applications for printing operations, which included a variety of operations including, but not limited to: flexographic operations (air dry and ultraviolet dry processes), lithographic operations, etc.

Similarly, under the No Project Alternative, collection and control equipment at existing landfills would likely increasingly violate Rule 1150.1; it would be difficult for landfills to expand, and there would be a low probability that new landfills would be built. As a result, to accommodate growth in the future, to the extent allowed under current laws and ordinances municipal and other types of solid wastes would likely need to be transported out of the district for disposal.

As can be seen in Appendix H, under the permit moratorium that temporarily ended as of January 1, 2010, there were pending permit applications for:

- five electrical generating engines at a landfill in Irvine;
- electrical generating engines at a landfill in Rolling Hills Estates;
- electrical generating engines at a landfill in West Covina;
- replacement of an old, inefficient boiler with a more efficient boiler to generate steam at a landfill in Fountain Valley;
- electrical generating engines at a landfill in Brea; electrical generating engines at a landfill in Sylmar, and
- one other miscellaneous permit application for equipment at a fire station.

As time goes existing commercial or industrial facilities could not expand and new facilities could not be built in the district in the future, commercial and industrial products, such as those identified in the bullet points above, would have to be imported. Similarly, new landfills could not be built and existing landfills could not be expanded. As a result, in the future municipal and other types of waste would likely need to be transported out of the district. Consequently, in the long term VMT, trip rates, and congestion in the district could increase as a result of importing commercial and industrial goods into the district and exporting municipal solid wastes out of the district. In the long term, it is expected that indirect traffic and transportation impacts from importing manufactured products and exporting municipal and other types of solid waste would be significant and greater than the proposed project.

Individually or Cumulatively Exceed LOS Standards

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, after May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets. Therefore, increased traffic could occur in the district that could individually or cumulatively exceed LOS levels because people may have to driver farther to obtain services if nearby services have to close down and there would be an increase in commercial and industrial products that would need to be imported into the district.

In the discussion in the "Cause a Substantial Increase in Traffic" subsection a list of pending permit applications listed in Appendix H shows the various types of commercial and industrial projects that would be unable to obtain permits in the future under the No Project Alternative. To accommodate future population growth in the district, it is expected that under the No Project Alternative a large portion of the same types of commercial and industrial products as described in the previous subsection would be manufactured outside of the district and imported into the district, thus, affecting LOS standards in the district.

As time goes by, new landfills could not be built and existing landfills could not be expanded as a result of the current permit moratorium. As a result, in the future municipal and other types of solid wastes would likely need to be transported out of the district, which could also affect local LOS standards in the district. See the discussion in the preceding section and Appendix for the types of landfill permit applications that would no longer be approved under the No Project Alternative.

Because existing commercial or industrial facilities could not expand and new facilities could not be built in the district in the future, commercial and industrial products, such as those identified in the bullet points in the preceding subsection, would have to be imported. Similarly, new landfills could not be built and existing landfills could not be expanded as a result of the current permit moratorium. As a result, in the future municipal and other types of waste would likely need to be transported out of the district. Consequently, in the long term VMT, trip rates, and congestion in the district could increase as a result of importing commercial and industrial goods into the district and exporting municipal solid wastes out of the district. In the long term, it is expected that traffic and transportation impacts from importing manufactured products and

exporting municipal and other types of solid waste would be significant and greater than the significance determination for the proposed project.

Change Air Traffic Patterns

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, after May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets and, therefore could not be built in the future.

Under the No Project Alternative after May 1, 2012, existing equipment would be expected to operate indefinitely into the future without replacement or modification because of the permit moratorium. Since most equipment has a useful lifetime duration, at some point in the future existing equipment would be expected to experience breakdowns and other types of failures that could diminish the manufacturing capacity of commercial and industrial facilities in the district, especially from equipment that has already been in operation for a number of years. As a result, there is the potential for an increase in traffic and transportation impacts from importing manufactured products and exporting municipal and other types of solid waste into and out of the district. Under this scenario, however, it is not likely that air traffic patterns would be significantly adversely affect for the following reasons.

First, municipal and other types of solid wastes are not typically transported via airplanes; this is not expected to change in the future. Second, although there could be an increase in the import of commercial or manufactured products in the future, this increase is not expected to affect air traffic patterns because more than half of the air cargo at LAX arrives and departs in the cargo holds of passenger aircraft, while apparel is the leading imported air cargo commodity¹. Freight that is transported in passenger planes is dependent on the number of passengers, so additional flights would not be expected to occur as a result of increased demand for commercial or industrial products unless there is a concurrent increase in the number of annual passengers. Manufacture of apparel does not typically require permits from the SCAQMD.

¹ Los Angeles World Airports, http://www.lawa.org/welcome_lax.aspx?id=776.

Based on the preceding information, under the No Project Alternative potentially significant adverse indirect impacts that could adversely affect air traffic patterns in the district would not be expected to occur after May 1 2012, and would be less than the significance determination for the proposed project.

Increase Road Hazards

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, after May 1, 2012, future new or modified facilities that would have had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets.

As noted in the "Population and Housing" discussion above, there would be no newly constructed facilities in the future that could induce population growth in the district that could increase the need for new or modified roadways in the vicinities of existing facilities. Further, construction of roadways does not typically require SCAQMD permits, although some of the individual pieces of equipment might require SCAQMD permits. For example, there were no pending permits for roadway projects identified in Appendix H, but under the permit moratorium that temporarily ended as of January 1, 2010, there were the following pending permits for asphalt manufacturers:

- three pending permit applications for blending and batching equipment; and
- two pending permit applications for asphalt storage.

As a result, under the No Project Alternative potentially significant adverse indirect impacts that could occur as a result of increased roadway hazards in the district would not be expected to occur after May 1 2012, and would be less than the significance determination for the proposed project. .

Result in Inadequate Emergency Access

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is

reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to result in inadequate emergency access are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets.

Since no new facilities could be built that require offsets from the SCAQMD's internal accounts to obtain permits and no existing facilities could expand, indirect emergency access impacts at affected facilities are not expected to be significant under the No Project Alternative. As a result, under the No Project Alternative potentially significant adverse indirect impacts that could result in inadequate emergency access in the district would not be expected to occur after May 1 2012, and would be less than the significance determination for the proposed project.

Result in Inadequate Parking

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to result in inadequate parking are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets.

As noted in the "Population and Housing" discussion above, there would be no newly constructed facilities in the future that could induce population growth in the district that could increase the need for additional parking capacity at existing facilities. Similarly,

construction of parking lots does not typically require SCAQMD permits, although some of the individual pieces of equipment might require SCAQMD permits. For example, there are no pending permits for parking lot projects identified in Appendix H, but under the permit moratorium that temporarily ended as of January 1, 2010, there were the following pending permits for asphalt manufacturers:

- three pending permit applications for blending and batching equipment; and
- two pending permit applications for asphalt storage.

However, because Alternative A is not expected to require additional parking capacity and in spite of the potential inability to permit future projects like those shown in the bullet points above, potentially significant adverse indirect impacts that could occur as a result of inadequate parking in the district would not be expected to occur after May 1 2012, and would be less than the significance determination for the proposed project.

Conflict with Alternative Transportation Policies

The No Project Alternative assumes that neither the proposed project nor Alternatives B through E would be adopted but that SB 827 will be in effect, which will allow the issuance of offsets between January 1, 2010, and May 1, 2012. In addition, it is reasonably foreseeable that three new power plants would be permitted pursuant to state legislation requiring the issuance of offsets from the SCAQMD's internal accounts. It should be noted, however, that issuance of permits pursuant to SB 827 and/or legislation pertaining to the power plants is independent from, and can proceed without the proposed project.

Under Alternative A, from January 1, 2010 to May 1, 2012, permits may be issued that rely on offsets from the SCAQMD's internal accounts. For this reason, and because of the potential impacts of reasonably foreseeable power plant projects, potential impacts from future facilities that have the potential to conflict with alternative transportation policies are considered to be significant. Starting May 1, 2012, future facilities that would have had access to the SCAQMD's internal accounts, through either Rule 1304 or Rule 1309.1, would no longer have access to these sources of offsets.

As noted in the "Population and Housing" discussion above, there would be no newly constructed facilities in the future that could induce population growth in the district that could increase the need for additional transportation resources or otherwise affect existing or future transportation policies. As a result, under the No Project Alternative potentially significant adverse indirect impacts that could conflict with transportation policies in the district would not be expected to occur after May 1 2012, and would be less than the significance determination for the proposed project.

Alternative B – Offset User Fees for Large Businesses

Cause a Substantial Increase in Traffic

The survey of CEQA documents to evaluate the potential impacts from a substantial increase in traffic from the proposed project identified the following primary facility categories that would significantly increase traffic: retail/services facilities, large commercial facilities, entertainment/recreational facilities, institutional facilities, light industrial/warehouse facilities and heavy industrial facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from a substantial increase in traffic, it was concluded that the proposed project would create significant adverse indirect impacts from a substantial increase in traffic.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect traffic impacts compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, some emission reduction projects have the potential to increase: traffic as a result of worker commute trips; the number of biosolids haul truck trips; material haul truck trips to import new equipment (e.g., replacement clean fuel backup generators, wind turbines); export construction debris and replaced equipment. Such projects include, but are not limited to installation of: wind turbine farms, solar collector facilities, alternative fuel refueling stations, biosolids energy production, and replacement of stationary source engines with portable engines or microturbines.

For the above reasons, it is concluded that Alternative B would create significant adverse traffic impacts greater than the proposed project. The contribution to cumulative traffic impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Individually or Cumulatively Exceed LOS Standards

The survey of CEQA documents to evaluate the potential traffic impacts from future projects that individually or cumulatively exceed LOS standards from the proposed project identified the following primary facility categories that would significantly adversely exceed LOS standards either individually or cumulatively: agricultural facilities, retail/services facilities, large commercial facilities, entertainment/recreational facilities and light industrial/warehouse facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique

characteristics and/or be sited in or near a location that could create significant adverse traffic impacts from future projects that individually or cumulatively exceed LOS standards, it was concluded that the proposed project would create significant adverse indirect traffic impacts from future projects that individually or cumulatively exceed LOS standards.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to individually or cumulatively exceed LOS standards compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, some emission reduction projects have the potential to increase: traffic as a result of worker commute trips; the number of biosolids haul truck trips; material haul truck trips to import new equipment (e.g., replacement clean fuel backup generators and wind turbines); export construction debris and replaced equipment. Such projects include, but are not limited to installation of: wind turbine farms, solar collector facilities, alternative fuel refueling stations, biosolids energy production, replacement of stationary source engines with portable engines or microturbines.

For the above reasons, it is concluded that Alternative B would create significant adverse LOS impacts greater than the proposed project. The contribution to cumulative LOS impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Change Air Traffic Patterns

The survey of CEQA documents to evaluate the potential impacts from future projects changing air traffic patterns from the proposed project identified no primary facility categories that would significantly adversely change air traffic patterns. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects changing air traffic patterns, it was concluded that the proposed project would create significant adverse indirect impacts from future projects changing air traffic patterns.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to change air traffic patterns compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, some emission reduction projects have the potential to increase: imports of new equipment (e.g., replacement clean fuel backup generators and wind turbines); and export replaced

equipment that may be recycled as scrap metal or put into use. Such projects include, but are not limited to installation of: wind turbine farms, solar collector facilities, replacement of stationary source engines with portable engines or microturbines.

For the above reasons, it is concluded that Alternative B would create significant adverse air traffic impacts greater than the proposed project. The contribution to cumulative LOS impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Increase Road Hazards

The survey of CEQA documents to evaluate the potential impacts from an increase in road hazards from the proposed project identified the following primary facility categories that would significantly adversely increase in road hazards: large commercial facilities and utility projects. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from an increase in road hazards, it was concluded that the proposed project would create significant adverse indirect impacts from an increase in road hazards.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect road hazard impacts compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, some emission reduction projects such as wind turbine farms, solar collector facilities, alternative fuel refueling stations, biosolids energy production, and replacement of stationary source engines with portable engines or microturbines, have the potential to increase road hazards because of the need, in some cases, to drive to equipment in remote locations, e.g., wind turbines and solar collectors.

For the above reasons, it is concluded that Alternative B would create significant adverse road hazard impacts greater than the proposed project. The contributions to cumulative road hazard impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Result in Inadequate Emergency Access

The survey of CEQA documents to evaluate the potential impacts from future projects resulting in inadequate emergency access from the proposed project identified no

primary facility categories that would significantly result in inadequate emergency access. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects resulting in inadequate emergency access, it was concluded that the proposed project would create significant adverse indirect impacts from future projects resulting in inadequate emergency access.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to result in inadequate emergency access compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, some emission reduction projects, depending on their location and configuration, may impede or result in inadequate emergency access. Construction of emission reduction projects and any associated increases in traffic have the potential to adversely affect emergency access because of the need for: temporary parking for construction workers, lay-down areas for equipment and supplies, delivery of construction equipment and supplies, removal of demolition wastes. Such projects include, but are not limited to installation of: wind turbine farms, solar collector facilities, alternative fuel refueling stations, biosolids energy production, and replacement of stationary source engines with portable engines or microturbines.

For the above reasons, it is concluded that Alternative B would create significant adverse emergency access impacts greater than the proposed project. The contribution to cumulative emergency access impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Result in Inadequate Parking

The survey of CEQA documents to evaluate the potential impacts from future projects resulting in inadequate parking from the proposed project identified the following primary facility categories that would significantly adversely affect parking availability: large commercial facilities and heavy industrial facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse parking impacts, it was concluded that the proposed project would create significant adverse indirect impacts on parking.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to result in inadequate parking compared to the proposed project. The main difference

between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. For example, some emission reduction projects have the potential to increase: traffic as a result of worker commute trips; the number of biosolids haul truck trips; material haul truck trips to import new equipment (e.g., replacement clean fuel backup generators and wind turbines); export construction debris; and replaced equipment. Construction of emission reduction projects and any associated increases in traffic have the potential to adversely affect parking because of the need for: temporary parking for construction workers, lay-down areas for equipment and supplies, delivery of construction equipment and supplies and removal of demolition wastes. Such projects include, but are not limited to installation of: wind turbine farms, solar collector facilities, alternative fuel refueling stations, biosolids energy production, replacement of stationary source engines with portable engines or microturbines.

For the above reasons, it is concluded that Alternative B would create significant adverse parking impacts greater than the proposed project. The contribution to cumulative inadequate parking impacts from Alternative B is expected to be significant and greater than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects.

Conflict with Alternative Transportation Policies

The survey of CEQA documents to evaluate the potential impacts from future projects conflicting with alternative transportation policies from the proposed project identified no primary facility categories that would significantly adversely conflict with alternative transportation policies. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects conflicting with alternative transportation policies, it was concluded that the proposed project would create significant adverse indirect impacts from future projects conflicting with alternative transportation policies.

Because the same types of facilities would be built under Alternative B, Alternative B would generate similar indirect impacts from future projects that have the potential to conflict with alternative transportation policies compared to the proposed project. The main difference between Alternative B and the proposed project is Alternative B also would result in the indirect effects of potential future emission reduction projects. Such projects include, but are not limited to installation of: alternative fuel refueling stations, retrofitting heavy-duty mobile sources with particulate filters and/or oxidation catalysts and early introduction of tier 4 locomotives.

Future individual projects in the primary facility categories and some future emission reduction projects could have unique characteristics that have the potential to conflict

with alternative transportation policies. However, some future emission reduction projects have the potential to enhance or further alternative transportation policies as discussed above. As a result, it is concluded that Alternative B would create significant adverse indirect impacts to alternative transportation policies less than the proposed project. The contribution to cumulative impacts from Alternative B that have the potential to conflict with alternative transportation policies is expected to be less than cumulative impacts for the proposed project because of the combined effects of constructing and operating future facilities affected by PR 1315 as well as the future effects of constructing and operating potential emission reduction projects that promote or enhance alternative transportation policies.

Alternative C –Large Businesses Prohibited from Accessing Rule 1304 Exemptions

Cause a Substantial Increase in Traffic

The survey of CEQA documents to evaluate the potential impacts from a substantial increase in traffic from the proposed project identified the following primary facility categories that would significantly increase traffic: retail/services facilities, large commercial facilities, entertainment/recreational facilities, institutional facilities, light industrial/warehouse facilities and heavy industrial facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from a substantial increase in traffic, it was concluded that the proposed project would create significant adverse indirect impacts from a substantial increase in traffic. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer increased traffic impacts compared to the proposed project.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts to traffic. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative C. On balance, it is concluded that the potential increased traffic impacts from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect increased traffic impacts from implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Individually or Cumulatively Exceed LOS Standards

The survey of CEQA documents to evaluate the potential traffic impacts from future projects that individually or cumulatively exceed LOS standards from the proposed project identified the following primary facility categories that would significantly adversely exceed LOS standards either individually or cumulatively: agricultural facilities, retail/services facilities, large commercial facilities, entertainment/recreational facilities and light industrial/warehouse facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse traffic impacts from future projects that individually or cumulatively exceed LOS standards, it was concluded that the proposed project would create significant adverse indirect traffic impacts from future projects that individually or cumulatively exceed LOS standards. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer adverse LOS impacts compared to the proposed project.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse LOS impacts. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative C. On balance, it is concluded that potential adverse LOS impacts from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contributions to cumulative LOS impacts from implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Change Air Traffic Patterns

The survey of CEQA documents to evaluate the potential impacts from future projects changing air traffic patterns from the proposed project identified no primary facility categories that would significantly adversely change air traffic patterns. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects changing air traffic patterns, it was concluded that the proposed project would create significant adverse indirect impacts from future projects changing air traffic patterns. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer impacts as a result in changes to air traffic patterns compared to the proposed project.

Based upon the above information, potential impacts as a result in changes to air traffic patterns from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contributions to cumulative indirect impacts as a result in changes to air traffic patterns from implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Increase Road Hazards

The survey of CEQA documents to evaluate the potential impacts from an increase in road hazards from the proposed project identified the following primary facility categories that would significantly adversely increase in road hazards: large commercial facilities and utility projects. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from an increase in road hazards, it was concluded that the proposed project would create significant adverse indirect impacts from an increase in road hazards. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer road hazard impacts due to design features compared to the proposed project.

Based upon the above information, potential road hazard impacts due to design features from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect road hazard impacts due to design features from implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Result in Inadequate Emergency Access

The survey of CEQA documents to evaluate the potential impacts from future projects resulting in inadequate emergency access from the proposed project identified no primary facility categories that would significantly result in inadequate emergency access. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects resulting in inadequate emergency access, it was concluded that the proposed project would create significant adverse indirect impacts from future projects resulting in inadequate

emergency access. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer indirect impacts from future affected facilities that could result in inadequate emergency access compared to the proposed project.

Based upon the above information, potential indirect impacts from future affected facilities that could result in inadequate emergency access as a result of implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts from future affected facilities that could result in inadequate emergency access from implementing Alternative C would be less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Result in Inadequate Parking

The survey of CEQA documents to evaluate the potential impacts from future projects resulting in inadequate parking from the proposed project identified the following primary facility categories that would significantly adversely affect parking availability: large commercial facilities and heavy industrial facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse parking impacts, it was concluded that the proposed project would create significant adverse indirect impacts on parking. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer impacts as a result of inadequate parking compared to the proposed project.

Based upon the above information, potential inadequate parking impacts from implementing Alternative C would be significant, but less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect parking impacts from implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Conflict with Alternative Transportation Policies

The survey of CEQA documents to evaluate the potential impacts from future projects conflicting with alternative transportation policies from the proposed project identified

no primary facility categories that would significantly adversely conflict with alternative transportation policies. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects conflicting with alternative transportation policies, it was concluded that the proposed project would create significant adverse indirect impacts from future projects conflicting with alternative transportation policies. Because fewer facilities could be built under Alternative C, Alternative C would generate similar or fewer indirect impacts from future affected facilities that have the potential to conflict with alternative transportation policies compared to the proposed project.

Based upon the above information, potential indirect impacts from future affected facilities that have the potential to conflict with alternative transportation policies as a result of implementing Alternative C were less compared to the proposed project because large businesses would no longer qualify for the exemption from federal offset requirements pursuant to Rule 1304. The contribution to cumulative indirect impacts from future affected facilities that have the potential to conflict with alternative transportation policies as a result of implementing Alternative C would be significant, but less than the proposed project because slightly fewer offsets would be debited from the SCAQMD's internal accounts as a result of prohibiting large businesses from qualifying for the offset exemption under Rule 1304, resulting in fewer facilities being constructed and operated in the future.

Alternative D - Use of Credits Generated in 2009 and Beyond Only

Cause a Substantial Increase in Traffic

The survey of CEQA documents to evaluate the potential impacts from a substantial increase in traffic from the proposed project identified the following primary facility categories that would significantly increase traffic: retail/services facilities, large commercial facilities, entertainment/recreational facilities, institutional facilities, light industrial/warehouse facilities and heavy industrial facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from a substantial increase in traffic, it was concluded that the proposed project would create significant adverse indirect impacts from a substantial increase in traffic. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of causing a substantial increase in traffic.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts to traffic. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative D. On balance, it is concluded that

indirect impacts from future projects that have the potential to cause a substantial increase in traffic as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to cause a substantial increase in traffic, but indirect cumulative traffic impacts would be less than the proposed project.

Individually or Cumulatively Exceed LOS Standards

The survey of CEQA documents to evaluate the potential traffic impacts from future projects that individually or cumulatively exceed LOS standards from the proposed project identified the following primary facility categories that would significantly adversely exceed LOS standards either individually or cumulatively: agricultural facilities, retail/services facilities, large commercial facilities, entertainment/recreational facilities and light industrial/warehouse facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse traffic impacts from future projects that individually or cumulatively exceed LOS standards, it was concluded that the proposed project would create significant adverse indirect traffic impacts from future projects that individually or cumulatively exceed LOS standards. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of individually or cumulative exceeding LOS standards.

As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse LOS impacts. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative D. On balance, it is concluded that indirect impacts from future projects that have the potential to cause, either individually or cumulatively, exceedances of LOS standards as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets

are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to cause, either individually or cumulatively, exceedances of LOS standards, but indirect cumulative LOS impacts would be less than the proposed project.

Change Air Traffic Patterns

The survey of CEQA documents to evaluate the potential impacts from future projects changing air traffic patterns from the proposed project identified no primary facility categories that would significantly adversely change air traffic patterns. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects changing air traffic patterns, it was concluded that the proposed project would create significant adverse indirect impacts from future projects changing air traffic patterns. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of changes in air traffic patterns.

Based upon the above information, indirect impacts from future projects that have the potential to cause changes in air traffic patterns as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to cause changes in air traffic patterns, but indirect cumulative air traffic impacts would be less than the proposed project.

Increase Road Hazards

The survey of CEQA documents to evaluate the potential impacts from an increase in road hazards from the proposed project identified the following primary facility categories that would significantly adversely increase in road hazards: large commercial facilities and utility projects. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from an increase in road hazards, it was concluded that the proposed project would create significant adverse indirect impacts from an increase in road hazards. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of increased road hazards.

Based upon the above information, indirect impacts from future projects that have the potential to increase road hazards due to design features as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to increase road hazards due to design features, but indirect cumulative road hazard impacts would be less than the proposed project.

Result in Inadequate Emergency Access

The survey of CEQA documents to evaluate the potential impacts from future projects resulting in inadequate emergency access from the proposed project identified no primary facility categories that would significantly result in inadequate emergency access. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects resulting in inadequate emergency access, it was concluded that the proposed project would create significant adverse indirect impacts from future projects resulting in inadequate emergency access. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts resulting in inadequate emergency access.

Based upon the above information, indirect impacts from future projects that have the potential to result in inadequate emergency access as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to result in inadequate emergency access, but indirect cumulative emergency access impacts would be less than the proposed project.

Result in Inadequate Parking

The survey of CEQA documents to evaluate the potential impacts from future projects resulting in inadequate parking from the proposed project identified the following primary facility categories that would significantly adversely affect parking availability: large commercial facilities and heavy industrial facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse parking impacts, it was concluded that the proposed project would create significant adverse indirect impacts on parking in the district. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts resulting in inadequate parking.

Based upon the above information, indirect impacts from future projects that have the potential to result in inadequate parking as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is

likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to result in inadequate parking, but indirect cumulative parking impacts would be less than the proposed project.

Conflict with Alternative Transportation Policies

The survey of CEQA documents to evaluate the potential impacts from future projects conflicting with alternative transportation policies from the proposed project identified no primary facility categories that would significantly adversely conflict with alternative transportation policies. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects conflicting with alternative transportation policies, it was concluded that the proposed project would create significant adverse indirect impacts from future projects conflicting with alternative transportation policies. Because fewer facilities could be built under Alternative D, Alternative D would generate similar but fewer impacts in terms of conflicts with alternative transportation policies.

Based upon the above information, indirect impacts from future projects that could conflict with alternative transportation policies as a result of implementing Alternative D are considered to be significant, but less than the proposed project because fewer offsets are expected to be available to be used per year compared to the proposed project, resulting in less overall impacts on an annual basis. The reasons fewer offsets are available are that the existing offset accounts would be eliminated and only new credits generated from the year 2009 on could be used as offsets. The contribution to cumulative impacts from Alternative D is expected to be significant, but less compared to the proposed project because pre-2009 offsets would no longer be available from the SCAQMD's internal accounts as these would be eliminated. Further, only new credits generated from the year 2009 from both major and minor sources could be used as offsets for the purpose of demonstrating equivalency with federal offset requirements. Therefore, it is likely that fewer facilities would be able to qualify for exemptions pursuant to Rules 1304 or 1309.1. There would, however, still be significant adverse indirect cumulative impacts from future projects that have the potential to conflict with alternative transportation policies, but indirect cumulative alternative transportation policy impacts would be less than the proposed project.

Alternative E – Limited Offset Availability

Cause a Substantial Increase in Traffic

The survey of CEQA documents to evaluate the potential impacts from a substantial increase in traffic from the proposed project identified the following primary facility

categories that would significantly increase traffic: retail/services facilities, large commercial facilities, entertainment/recreational facilities, institutional facilities, light industrial/warehouse facilities and heavy industrial facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from a substantial increase in traffic, it was concluded that the proposed project would create significant adverse indirect impacts from a substantial increase in traffic. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of causing a substantial increase in traffic.

Indirect increased traffic impacts from implementing Alternative E would be less than indirect increased traffic impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If debit demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse impacts to traffic. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative E. On balance, it is concluded that indirect increased traffic impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative increased traffic impacts from implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Individually or Cumulatively Exceed LOS Standards

The survey of CEQA documents to evaluate the potential traffic impacts from future projects that individually or cumulatively exceed LOS standards from the proposed project identified the following primary facility categories that would significantly adversely exceed LOS standards either individually or cumulatively: agricultural facilities, retail/services facilities, large commercial facilities, entertainment/recreational facilities and light industrial/warehouse facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse traffic impacts from future projects that individually or cumulatively exceed LOS standards, it was concluded that the proposed project would create significant adverse indirect traffic impacts from future projects that individually or cumulatively exceed

LOS standards. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of individually or cumulatively exceeding LOS standards.

Indirect impacts from future facilities that have the potential to individually or cumulatively exceed LOS standards as a result of implementing Alternative E would be less than indirect LOS standards impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. As discussed under Alternative A, however, limitations on the ability to modify or replace sources could also potentially result in adverse LOS impacts. Therefore, environmental impacts may not be proportional to the number of projects constructed and operated as a result of implementing Alternative E. On balance, it is concluded that indirect LOS standards impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative LOS standards impacts from implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Change Air Traffic Patterns

The analysis of potential indirect impacts from future projects changing air traffic patterns as a result of implementing Alternative E is based on comparing the relative merits of this alternative with the proposed project. The survey of CEQA documents to evaluate the potential impacts from future projects changing air traffic patterns from the proposed project identified no primary facility categories that would significantly adversely change air traffic patterns. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects changing air traffic patterns, it was concluded that the proposed project would create significant adverse indirect impacts from future projects changing air traffic patterns. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of changing air traffic patterns.

Indirect air traffic pattern impacts from implementing Alternative E would be less than indirect air traffic pattern impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary

source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections, the SCAQMD would stop issuing permits. Based on the foregoing, indirect air traffic pattern impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative air traffic pattern impacts from implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Increase Road Hazards

The analysis of potential indirect impacts from an increase in road hazards as a result of implementing Alternative E is based on comparing the relative merits of this alternative with the proposed project. The survey of CEQA documents to evaluate the potential impacts from an increase in road hazards from the proposed project identified the following primary facility categories that would significantly adversely increase in road hazards: large commercial facilities and utility projects. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from an increase in road hazards, it was concluded that the proposed project would create significant adverse indirect impacts from an increase in road hazards. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of increased road hazards.

Indirect increased road hazards impacts from implementing Alternative E would be less than indirect increased road hazards impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect increased road hazards impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative increased road hazards impacts from implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Result in Inadequate Emergency Access

The survey of CEQA documents to evaluate the potential impacts from future projects resulting in inadequate emergency access from the proposed project identified no primary facility categories that would significantly result in inadequate emergency access. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects resulting in inadequate emergency access, it was concluded that the proposed project would create significant adverse indirect impacts from future projects resulting in inadequate emergency access. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts resulting in inadequate emergency access.

Indirect inadequate emergency access impacts from implementing Alternative E would be less than indirect inadequate emergency access impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect inadequate emergency access impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative inadequate emergency access impacts from implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Result in Inadequate Parking

The survey of CEQA documents to evaluate the potential impacts from future projects resulting in inadequate parking from the proposed project identified the following primary facility categories that would significantly adversely affect parking availability: large commercial facilities and heavy industrial facilities. For this reason and the possibility that future individual projects in these and other facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse parking impacts, it was concluded that the proposed project would create significant adverse indirect impacts on parking. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer resulting in inadequate parking.

Indirect inadequate parking impacts from implementing Alternative E would be less than indirect inadequate parking impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If debit demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, indirect inadequate parking impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative inadequate parking impacts from implementing Alternative E would be significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

Conflict with Alternative Transportation Policies

The survey of CEQA documents to evaluate the potential impacts from future projects conflicting with alternative transportation policies from the proposed project identified no primary facility categories that would significantly adversely conflict with alternative transportation policies. However, because of the possibility that future individual projects in the primary facility categories could have unique characteristics and/or be sited in or near a location that could create significant adverse indirect impacts from future projects conflicting with alternative transportation policies, it was concluded that the proposed project would create significant adverse indirect impacts from future projects conflicting with alternative transportation policies. Because fewer facilities could be built under Alternative E, Alternative E would generate similar but fewer impacts in terms of conflicts with alternative transportation policies.

Indirect impacts from future facilities that have the potential to conflict with alternative transportation policies as a result of implementing Alternative E would be less than indirect alternative transportation policy impacts from the proposed project because fewer facilities would be constructed and operated in the future. The reason for this conclusion is as follows. The availability of offsets under Alternative E from the growth in stationary source emissions from for the relevant industry categories anticipated by the AQMP would be at most 50 percent of the availability of offsets compared to the proposed project, i.e., 50 percent of the 2007 AQMP growth projections. If offset demand exceeds 50 percent of the 2007 AQMP growth projections for the relevant industry categories, the SCAQMD would stop issuing permits. Based on the foregoing, specific indirect alternative transportation policy impacts from Alternative E would be significant, but less compared to the proposed project. Similarly, the contribution to cumulative impacts from future facilities that have the potential to conflict with alternative transportation policies as a result of implementing Alternative E would be

significant, but less than the proposed project because fewer debits would be available to offset emissions from facilities that qualify for exemptions under Rules 1304 or 1309.1.

CHAPTER 8

RESPONSES TO THE COURT'S DECISION ON AMENDED RULE 1309.1 AND RULE 1315

INTRODUCTION

This PEA’s analysis of the impacts from re-adopting proposed Rule 1315, with the modifications described in Chapter 2, addresses the final decision by the Superior Court of the State of California, County of Los Angeles in its Decision on Ruling on Respondent’s Motion for Summary Adjudication in *Natural Resources Defense Council, Inc., et al. (Petitioners) v. SCAQMD (Respondent)* (Case No. BS 110792) (filed July 28, 2008).

The purpose of this Chapter of the PEA is to provide a convenient way for the reader to identify how the SCAQMD has responded to each of the Court’s determinations and where the revised analysis is located in the PEA.

SUMMARY OF COURT’S DECISION

In the July, 2008 Decision on Ruling on Respondent’s Motion for Summary Judgment, the Superior Court found the SCAQMD’s CEQA analysis for its adoption of Rule 1315 (in its previous form) and amendment of Rule 1309.1 to be inadequate regarding its description of the proposed project, the analyses of impacts from air emissions on health, aesthetics and climate change, and its treatment of certain mitigation measures.

A more detailed description of the Court’s decision as to each of these topics, and a summary of the PEA’s response to each topic follows.

PROJECT DESCRIPTION

Court Decision:

The Superior Court found that the SCAQMD had not provided an adequate project description for the adoption of Rule 1315 and amendment of Rule 1309.1. The Court stated that the “District impermissibly disaggregated the two rules and failed to consider the obvious and intended impacts of the rules operating in tandem. In the Project Objectives, the District separated the objectives of the amendments to Rule 1309.1 and the proposed objectives of Rule 1315. By doing so, the District failed to describe the objectives of both rules as a coherent whole.”(Page 11, lines 14-20).

Response:

The rule changes that were the subject of the Court’s decision included an amendment to SCAQMD Rule 1309.1 that would have allowed new power plants to qualify for offsets from the SCAQMD’s Priority Reserve for a limited period of time. That rule amendment is no longer proposed. Therefore, the project description for the proposed project is limited to the readoption of Rule 1315, with the modifications described in Chapter 2.

As explained in Chapter 2, under the provisions of AB 1318, enacted in 2009, SCAQMD is required to provide offsets from its internal accounts to the CPV Sentinel Energy Project, and it is possible that similar legislation will be adopted for one other power

plant (Walnut Creek Mission Energy Project). In addition, when preparation of the PEA commenced, it was possible that similar legislation would be adopted for the NRG El Segundo Repowering project. However, implementation of legislation for these power plants is not part of the proposed project, and would not depend upon approval of the proposed project. The environmental impacts of each of the three power plants were evaluated by the California Energy Commission (CEC) in separate Final Staff Assessments (FSAs). The CEC's analysis and conclusions regarding criteria pollutant and GHG emissions for these plants, as supplemented by SCAQMD staff analysis where needed, have been summarized and incorporated in the cumulative analysis in subchapter 4.1.

Court Decision:

The Superior Court's decision also stated: "The mischief in the PEA begins with the District's repeated assertions that Rule 1315 will have no environmental impacts and therefore, need not be analyzed in the PEA. But, it is the universe of emissions credits (and, foreseeably and consequently, the emissions that will be allowed thereby to be released in the environment) that is at the heart of a programmatic assessment of the rule-making." (Page 11 line 27 to 12 line 10) The Court went on to say: "The scope and foreseeable impact of Rule 1315 on the environment is greater, in fact, than the Rule 1309.1 amendments upon which respondents focus. Nor is the impact of Rule 1315-on a programmatic basis-limited to the eleven power plants currently in line for Priority Reserve access." (Page 12 lines 14-18). Further, the Court stated: "The environmental effects of Rule 1315, in conjunction with the current and future amendments to Rule 1309.1 are real, capable of being quantified, and not remote or speculative." (Page 13, lines 9-11).

Response:

The project description for the readoption of Rule 1315 (as modified) has been revised to include as a project objective the ability for the SCAQMD to establish a tracking system to continue to implement its New Source Review offset program, including making offsets available from its internal accounts for sources that qualify for offsets under Rule 1309.1 as it existed before the 2006 amendments, (primarily essential public services) as well as projects exempt from offsets under Rule 1304 but not exempt under federal law. Therefore, the environmental analysis of the proposed project includes an analysis of the environmental impacts of permitting all such sources. (see Chapters 4 and 5) The analysis includes a quantitative discussion of the direct air quality, health, visibility and greenhouse gas impacts from sources permitted under Rules 1304 and 1309.1, compared to a situation in which no new or modified sources would be permitted under Rules 1309.1 and 1304 after June, 2010. In addition, the analysis includes a qualitative discussion of the types of other environmental impacts that may result from the construction and operation of facilities with sources permitted under Rules 1309.1 and 1304.

In addition, the PEA’s analysis of cumulative impacts includes an analysis of the environmental impacts of other sources permitted in reliance on the SCAQMD internal account offsets, including the sources permitted under earlier versions of Rule 1315 and SB 827 and the three power plants that potentially could be granted access to SCAQMD internal accounts offsets through legislation.

In sum, the SCAQMD previously took the position that the adoption of Rule 1315 did not create new environmental impacts other than those associated with the power plants that would have qualified for offsets from the SCAQMD’s Priority Reserve under amended Rule 1309.1, because the other sources that accessed offsets under proposed Rule 1315 were the same types of sources that had always accessed the SCAQMD internal accounts. In this PEA, the SCAQMD has responded to the Court’s decision by analyzing the impacts resulting from all new or modified sources potentially eligible to receive permits under Rules 1309.1 and 1304 in reliance upon SCAQMD internal account offsets tracked under proposed Rule 1315. The PEA also analyzes the cumulative impacts of the proposed project plus emissions from other sources that may rely upon the SCAQMD’s internal account offsets pursuant to State legislation. See Chapters 4 and 5.

HEALTH EFFECTS

Court Decision:

The Superior Court decision stated: “The PEA analyzes the health effects of the project at only one location, the Vernon Power Plant. Rather than conduct the analysis necessary to quantify (at least approximately) the health effects of the entire program, the PEA instead simply says that such a task is ‘not possible.’” (Page 16, lines 12-22). The Court went on to say: “Further, the District also fails to analyze meaningfully the cumulative health impacts of Rule 1315’s introduction of millions of pounds of new pollution—pollution credits that are intended to be and will be converted into new emissions-into the Basin. There is no analysis performed of the health impacts of increased smog precursors, particularly for inland regions like Riverside where it accumulates. (AR 6063) The District also failed to analyze the collective health effects of increasing particulate matter in an area already exceeding state and federal health standards. (AR 5442)” (Page 17, line 21 through 18, line 2)

Response:

The PEA includes an analysis of the health effects of the incremental change in particulate and ozone pollution on a regional basis resulting from the emissions of these pollutants and their precursors attributed to the proposed project, i.e. the emissions from sources potentially eligible for permits issued under Rules 1304 and 1309.1 after June, 2010 (see subchapter 4.1).

The emissions resulting from facilities with sources to be issued permits under Rules 1304 and 1309.1 are included in the 2007 AQMP growth projections. As a result of control measures identified in the AQMP, adverse health effects from particulate matter

and ozone will be reduced over time, even if the regional growth accounted for in the AQMP occurs. Because adverse health effects will continue to be reduced over time, the health effects of the proposed project are expressed as potential additional benefits beyond those contemplated by the 2007 AQMP that would be foregone by approving the proposed project.

The PEA also includes a cumulative impacts analysis that quantifies the health effects from emissions of particulates and ozone precursors attributed to the proposed project plus the emissions from other sources permitted in reliance on the SCAQMD internal account offsets, including the sources permitted pursuant to prior versions of Rule 1315 and SB 827. The PEA also specifically quantifies the health impacts of each of the three power plants that may receive access to offsets through legislation individually, as well as including their emissions in the cumulative health impacts analysis. (see subchapter 4.1).

In addition to addressing health effects from emissions of particulates and ozone precursors, the PEA analyzes cancer and non-cancer health risk from region-wide emissions of toxic air contaminants (TACs) attributed to the proposed project. The PEA also assesses the cumulative cancer and non-cancer health risk from TACs attributed to the proposed project plus TACs resulting from other sources permitted in reliance on the SCAQMD internal account offsets, including the sources permitted pursuant to prior versions of Rule 1315 and SB 827 and the three potential power plants (see subchapter 4.1).

Finally, the PEA qualitatively discusses cancer and non-cancer health risk from localized concentrations of TACs resulting from individual facilities with sources permitted under Rules 1304 and 1309.1. The PEA also discloses the cancer and non-cancer health risks from localized concentrations of TACs resulting from the three potential power plants, as determined by the California Energy Commission.

AESTHETIC IMPACTS

Court Decision:

The Superior Court stated: “the PEA suffers from the District’s failure to consider the impact of increasing significantly the particulate and sulfuric emissions that are the foreseeable consequence of the program. And, to the extent the PEA does analyze aesthetic impacts, the discussion is impermissibly disaggregated and limited to the speculative musings as to the aesthetic implications of as-yet undesigned and yet-to-be constructed power plants....The most obvious visual effect of allowing millions of pounds of new pollution to be introduced into the already polluted air of the Basin—the further browning of the sky—is completely unaddressed in the PEA.” (Page 19, lines 10-26)

Response:

The PEA analyzes the impacts on region-wide visibility resulting from the operation of the sources potentially eligible to be issued permits under Rules 1304 and 1309.1 in reliance on the SCAQMD’s internal accounts (see subchapter 4.1). It should be noted that visibility will improve in the future due to the control measures described in the 2007 AQMP, as explained in subchapter 4.1. However, the PEA analyzes the incremental impacts on visibility resulting from the emissions from sources potentially eligible to be issued permits under Rules 1304 and 1309.1 after June, 2010 to determine whether the collective emissions from those sources would result in a significant decrease in visibility. The results are shown in subchapter 4.1. In addition, the PEA analyzes the cumulative impacts on visibility from the proposed project plus the other reasonably foreseeable sources that may be issued permits in reliance on the SCAQMD’s internal accounts, including the sources permitted under prior versions of Rule 1315 and SB 827 and the three potential power plants.

GREENHOUSE GASES

Court Decision:

The Superior Court stated: “The District’s PEA limited its discussion of the greenhouse gas/global warming consequences of the project to the increased generation of a single greenhouse gas—carbon dioxide. The emission credits captured and tracked under the new Rule 1315 and their use to allow the construction of new electric generating facilities has a certain and foreseeable effect on global warming.”(Page 21, lines 8-14)

Response:

This PEA quantifies the greenhouse gases expected to be emitted by sources potentially eligible to be issued permits under Rules 1309.1 and 1304 after June, 2010 (see subchapter 4.1). The analysis includes the six greenhouse gases identified under AB 32, and includes both the increased emissions of greenhouse gases associated with combustion processes, which can be correlated with SOx emissions, as well as increased emissions of other greenhouse gases associated with the types of facilities that may receive permits under Rules 1309.1 and 1304. (see subchapter 4.1)

The PEA also includes an analysis of cumulative greenhouse gas emissions attributed to the proposed project plus the greenhouse gas emissions from the other reasonably foreseeable sources that may be issued permits in reliance on the SCAQMD’s internal account offsets, including the projects permitted under prior versions of Rule 1315 and SB 827 and the three potential power plants (see subchapter 4.1).

SCOPE OF EMISSIONS ATTRIBUTED TO THE PROPOSED PROJECT

Court’s Decision:

Based upon the information in the prior record, the Superior Court concluded that all of the newly-tracked types of credits would be used. The Superior Court stated: “The size and breadth of the Priority Reserve has clear, obvious and measurable consequences in a world in which those credits will be accessed and used by credit-hungry polluters... Nor does the court find convincing respondents’ assertion that they have no plans for the use of all of the credits in the reserve and have no idea whether anyone will ever use this burgeoning collection of Priority Reserve emission credits.” The court further stated: “it cannot be doubted that in a world of ever-scarcer emission credits that a huge cache of district-held credits in a now-accessible Priority Reserve will be used.” (Decision, p. 10)

Response:

In preparing this PEA, the SCAQMD carefully considered whether it would be reasonably likely that all credits tracked in the SCAQMD internal accounts would be used to permit new or modified sources. Under proposed Rule 1315, the sources that can receive permits in reliance upon the SCAQMD internal account offsets are limited to sources permitted under Rules 1304 and 1309.1. The only other reasonably foreseeable sources that may receive permits in reliance upon credits in the SCAQMD internal accounts are those sources that are not relying upon proposed Rule 1315. Instead, they are sources that the State Legislature has instructed must be permitted in reliance upon those accounts. The PEA accounts for emissions from those other sources in the analysis of cumulative impacts.

Proposed Rule 1315 sunsets in 2030, which further limits the extent to which sources can be permitted in reliance upon the tracking system established under proposed Rule 1315. Accordingly, the universe of sources that could be permitted in reliance upon the SCAQMD internal account offsets under proposed Rule 1315 is limited to sources permitted under Rules 1304 and 1309.1 from the date Rule 1315 takes effect until 2030. As explained in subchapter 4.0, the growth in such sources is included in the 2007 AQMP. Moreover, the revised rule includes a “cap” which limits the amount of emissions from sources permitted under Rule 1304 and Rule 1309.1 to the amount analyzed in the PEA. This PEA analyzed the impact of the proposed project based on the difference between emissions with the project and without it. The analysis used the AQMP growth projections for source categories which could use Rule 1304 and Rule 1309.1 as the potential increase in emissions. Thus, including the cap assures that future emissions from the project will not exceed the amount analyzed in this PEA. Thus, the revised proposed rule precludes the occurrence of the situation envisioned by the court in which all available credits would be used.

This Chapter presents historical information indicating that offsets in the SCAQMD’s internal accounts are not used at the same rate as credits are generated. Nevertheless, to

respond further to the Court's decision, the incremental emissions associated with use of all potential credits have been calculated and are presented below under a "maximum use scenario." The air quality, health, visibility, and greenhouse gas impacts from the maximum use scenario would be greater than the impacts attributed to the proposed project in Chapter 4. The "maximum use scenario" assumes that all the offsets in the SCAQMD's internal accounts are used over the 20 year life of the project. The analysis uses the balances in the SCAQMD accounts as of 12-31-06 as the amounts to be used. This amount is used because it is the last annual balance reported to the SCAQMD Governing Board under the prior version of Rule 1315 before it was invalidated by the court.

Historic Use of Credits in SCAQMD Internal Accounts

Growth in the use of offsets represents growth in emissions from new or modified sources in the region. The ability of the region to attract or support growth is not unlimited. Each AQMP submitted by the SCAQMD to U.S. EPA projects future economic, population, and transportation growth. The growth projections are based on analyses provided by the Southern California Association of Governments (SCAG), the metropolitan planning organization for the district. The SCAQMD is required by state law to use SCAG's growth projections. Health & Safety Code § 40460(b). The SCAQMD then formulates its air quality plan to demonstrate attainment as required by federal law with the national ambient air quality standards assuming that such growth will occur. Thus, the most accurate estimate of the demand for offsets is the AQMP growth projections. It should be noted that consistently, the AQMP's growth projections have been overly optimistic, such that actual growth has been less than projected by SCAG.

Historically, the availability of offsets in the SCAQMD internal accounts has been greater than demand. A "credit" to the SCAQMD internal accounts represents an emission reduction, most often due to an "orphan shutdown." (This is defined in Rule 1315(b)(3) as an emission reduction resulting from the removal of a permitted source that is not otherwise required and does not result in the issuance of an "emission reduction credit" on the private market. In other words, if the owner of a source fails to claim any credits upon shutdown, the SCAQMD claims them and puts them in its internal accounts.) A "debit" is the use of an offset to support a new or modified source. Typically, there are more credits coming into the SCAQMD internal accounts than debits leaving the accounts for each year and for each pollutant.

The SCAQMD regularly reports on its tracking of credits and debits from its internal offset accounts. SCAQMD Rule 1310 – Analysis and Reporting, requires SCAQMD staff to report to the SCAQMD Governing Board on an annual basis the effectiveness of Regulation XIII in meeting the state and federal NSR requirements. The last report to the Board (February 2, 2007) presents final determinations of equivalency (FDE) covering the following two reporting periods: August 2002 through July 2003 and August 2003 through July 2004. The February 2, 2007 report to the board also presented a preliminary determination of equivalency (PDE) for the period August 2004 through December 2005. The FDEs and PDE in the Board report demonstrate compliance with federal NSR

requirements by establishing aggregate equivalence with federal offset requirements for sources that obtained their offsets from SCAQMD.

The FDEs for the August 2002 through July 2003 and August 2003 through July 2004 timeframes are summarized below in Tables 8-1 and 8-2, respectively. Additionally, the projections of SCAQMD's internal account offset balances for the August 2004 through December 2005, the January 2006 through December 2006, and January 2007 through December 2007 timeframes are presented in Table 8-3. These reports show that not all the offsets in the SCAQMD internal accounts have been used.

For example, Table 8-1 shows total credit activity for the period August 2002 – July 2003. As indicated in the August 2002 – July 2003 reporting period in Table 8-1, 1,424 pounds per day (approximately 0.71 ton per day) of VOC offsets were used (debited) from the SCAQMD's internal accounts. However, as of August 2002, 68.70 tons per day of VOC offsets were available. Similarly, VOC credits activity during the reporting period showed that the ending VOC balance, 74.29 tons per day, exceeded the starting balance, 68.70 tons per day, by 5.59 tons per day, which confirms that not only were all credits in the SCAQMD's internal accounts not used, but additional credits were generated that were also not used. For all pollutants shown in Table 8-1, the sum of credits/debits is positive, meaning that more emission reductions were deposited into the SCAQMD internal accounts than were used.

TABLE 8-1
Final Determination of Equivalency for August 2002 through July 2003*

DESCRIPTION	VOC	NO _x	SO _x	CO	PM ₁₀
Starting Balance (tons/day)	68.70	28.84	10.72	7.84	7.68
Total Credits** (pounds/day)	13,515	5,908	545	7,149	3,480
Total Debits** (pounds/day)	-1,424	-2,066	-135	-4,544	-211
Sum of Credits/Debits** (pounds/day)	12,091	3,842	410	2,605	3,269
Sum of Credits/Debits** (tons/day)	6.05	1.92	0.20	1.30	1.63
Surplus Adjustment*** (tons/day)	-0.46	-0.44	0.00	0.00	0.00
Ending Balance**** (tons/day)	74.29	30.32	10.92	9.14	9.31

* Source: Board agenda item #37, February 2, 2007.

** Credits are shown as positive and Debits as negative, while sum of Credits/Debits and Net Activity are shown as positive or negative, as appropriate.

*** Surplus at the time of use discount pursuant to the 2006 version of Rule 1315(b)(4), which has since been rescinded.

**** Ending Balance" equals the "Starting Balance" plus the sum of credits and debits and plus any surplus adjustments.

For PM₁₀, Table 8-1 shows that 211 pounds per day (approximately 0.10 ton per day) were used (debited), while 7.68 tons per day were available. Similarly, PM₁₀ credit activity during the reporting period showed that the ending PM₁₀ balance, 9.31 tons per

day, exceeded the starting balance, 7.68 tons per day, by 1.63 tons per day, which confirms that not only were all PM10 credits in the SCAQMD's internal accounts not used, but additional PM10 credits were generated that were also not used.

For SOx, Table 8-1 shows that 135 pounds per day (approximately 0.06 ton per day) were used (debited), while 10.72 tons per day were available. Similarly, SOx credit activity during the reporting period showed that the ending SOx balance, 10.92 tons per day, exceeded the starting balance, 10.72 tons per day, by 0.20 ton per day, which confirms that not only were all SOx credits in the SCAQMD's internal accounts not used, but additional SOx credits were generated that were also not used.

For NOx, Table 8-1 shows that 2,066 pounds per day (approximately 1.03 tons per day) were used (debited), while 28.84 tons per day were available. Similarly, NOx credit activity during the reporting period showed that the ending NOx balance, 30.32 tons per day, exceeded the starting balance, 28.84 tons per day, by 1.48 tons per day, which confirms that not only were all NOx credits in the SCAQMD's internal accounts not used, but additional NOx credits were generated that were also not used.

Table 8-2 shows total credit activity for the period August 2003 – July 2004. As indicated in the August 2003 – July 2004 reporting period in the Table 8-2, 539 pounds per day (approximately 0.26 ton per day) of VOC offsets were used (debited) from the SCAQMD's internal accounts. However, as of August 2003, 74.29 tons per day of VOC offsets were available. Similarly, VOC credits activity during the reporting period showed that the ending VOC balance, 82.90 tons per day, exceeded the starting balance, 74.29 tons per day, by 8.61 tons per day, which confirms that not only were all VOC credits in the SCAQMD's internal accounts not used, but additional VOC credits were generated that were also not used.

TABLE 8-2
Final Determination of Equivalency for August 2003 through July 2004*

DESCRIPTION	VOC	NO_x	SO_x	CO	PM₁₀
Starting Balance* (ton/day)	74.29	30.32	10.92	9.14	9.31
Total Credits** (lb/day)	18,795	3,912	1,833	5,634	2,639
Total Debits** (lb/day)	-539	-1,610	-3	-3,521	-245
Sum of Credits/Debits** (lb/day)	18,256	2,302	1,830	2,113	2,394
Sum of Credits/Debits** (ton/day)	9.13	1.15	0.91	1.06	1.20
Surplus Adjustment*** (ton/day)	-0.52	-2.21	-0.59	0.00	0.00
Ending Balance**** (ton/day)	82.90	29.26	11.24	10.20	10.51

* Same as “Ending Balance” from Table 8-1.

** Credits are shown as positive and Debits as negative, while sum of Credits/Debits and Net Activity are shown as positive or negative, as appropriate.

*** Surplus at the time of use discount pursuant to the 2006 version of Rule 1315(b)(4), which has since been rescinded.

**** Ending Balance” equals the “Starting Balance” plus the sum of credits and debits and plus any surplus adjustments.

Source: Board agenda item #37, February 2, 2007.

For PM₁₀, Table 8-2 shows that 245 pounds per day (approximately 0.12 ton per day) were used (debited), while 9.31 tons per day were available. Similarly, PM₁₀ credit activity during the reporting period showed that the ending PM₁₀ balance, 10.51 tons per day, exceeded the starting balance, 9.31 tons per day, by 1.20 tons per day, which confirms that not only were all PM₁₀ credits in the SCAQMD’s internal accounts not used, but additional PM₁₀ credits were generated that were also not used.

For SO_x, Table 8-2 shows that three pounds per day (approximately 0.001 ton per day) were used (debited), while 10.92 tons per day were available. Similarly, SO_x credit activity during the reporting period showed that the ending SO_x balance, 11.24 tons per day, exceeded the starting balance, 10.92 tons per day, by 0.32 ton per day, which confirms that not only were all SO_x credits in the SCAQMD’s internal accounts not used, but additional SO_x credits were generated that were also not used.

For NO_x, Table 8-2 shows that 1,610 pounds per day (approximately 0.80 ton per day) were used (debited), while 30.32 tons per day were available. During this reporting period, NO_x credit activity during the reporting period showed that the ending NO_x balance, 29.26 tons per day, was less than the starting balance, 30.32 tons per day, by 1.06 tons per day. Although the ending NO_x balance was slightly less than the beginning balance, the data show that there were excess NO_x credits (29.26 tons per day) that were not used, which still confirms that not all NO_x credits in the SCAQMD’s internal accounts were used.

As can be seen from the above Tables 8-1 and 8-2, consistently the demand for credits has not been anywhere near the total amount of credits available. Moreover, generally there have been more emission reductions (credits deposited) than emissions increases (offsets used) in any given year. Thus, it is clear that based on past history, not all available credits will be used. Nevertheless, to further ensure that emissions increases do not exceed the amount analyzed in this PEA, proposed Rule 1315 contains a CEQA backstop provision that requires that permits relying on SCAQMD internal accounts may no longer be issued once the amount analyzed in this PEA is reached.

Another way to evaluate the data provided in Tables 8-1 and 8-2 is to compare actual offset usage with the total offset usage that could occur if all offsets were used. For example, in the reporting period August 2002 – July 2003 the total number of offsets debited from the SCAQMD’s internal accounts was 0.71 ton per day out of a total of 68.70 tons of available VOCs. Therefore, actual VOC offset activity represented approximately one percent of the total available VOC offsets. Similarly, for the same reporting period the actual number of PM10 offsets used was 0.10 ton per day out of a total of 7.68 tons per day of available PM10 offsets. Therefore, actual PM10 offset activity represented approximately 1.3 percent of the total PM10 offsets available for use. For past AQMPs, growth projections have ranged between approximately one and two percent per year. For example, the future growth factor provided by SCAG for the 2007 AQMP relied on an annual growth factor of one percent per year for the district. The future population growth that would have to occur in the district to deplete all available credits even over a period of 20 years, would far exceed these growth projections.

Impact Analysis Assuming Full Use of Credits (Maximum Use Scenario)

Based on the above considerations, usage of all offsets in the SCAQMD’s internal accounts for permits issued under Rule 1304 and 1309.1 by 2030 is considered unlikely. Moreover, the proposed project has been designed so that it is not possible for all offsets in the beginning balance plus those deposited in future years to be used. The proposed project now includes a cap on the amount of offsets that can be used.

Nevertheless, to address the concern in Court’s decision regarding impacts of use of all offsets, this Chapter presents an analysis of air quality, health, visibility and greenhouse gas impacts that would occur if all the offsets in the SCAQMD’s internal accounts were used over the next 20 years.

Mass Emissions of Criteria Pollutants

The SCAQMD staff used the actual starting balances as of 12-31-06 as the “maximum use scenario” emissions that would occur.

TABLE 8-3

Maximum Use Scenario Mass Emissions of Criteria Pollutants

	VOC	NO_x	SO_x	PM₁₀	Lead
Tons per Day					
2007-2030	66.55	25.50	2.33	11.18	0.003
Pounds per Day					
2007-2030	133,100	51,000	4,660	22,360	1.08

Modeled Concentrations of Criteria Pollutant Emissions

The SCAQMD used the same methodology as is described in subchapter 4.0 to model region-wide concentrations of pollutants attributed to the maximum use scenario. Modeling was based on the assumption on that actual emissions from permitted facilities would be 80% of permitted emissions, reflecting the fact that facilities do not typically operate full time at full capacity.

Ozone

The maximum use of credits emissions scenario would result in nominally lower ozone concentrations in the Basin but higher ozone in Coachella Valley. Increased Basin NO_x emissions act to reduce local ozone concentrations due to titration of ozone to nitrogen dioxide. The nitrogen dioxide is transported downwind remains available for ozone formation at a later time. As a consequence, the maximum use emission scenario would result in fewer foregone ozone benefits in the Basin but would increase the foregone ozone benefits in the Coachella Valley. The impact of this scenario on attainment of the federal standards attainment (foregone earlier attainment date) for either basin would be nominal.

TABLE 8-4
Maximum Use of Credits Regional Ozone Impacts

Year	Basin Average Ozone Impact (ppb)	Basin Maximum Station Ozone Impact (ppb)	Coachella Valley Average Ozone Impact (ppb)	Coachella Valley Maximum Station Ozone Impact (ppb)
2014	0.2	0.4	0.3	0.4
2023	0.9	1.5	1.0	1.3
2030	2.1	2.8	1.6	2.0

Note: The contribution to regional ozone contributions for the Basin is less than from the proposed project even though emissions of ozone precursors are greater. This is because the emissions in the maximum use scenario contain a greater amount of NO_x relative to the VOC. The change in ratio changes the resulting ozone concentrations.

Particulate Matter

Annual average and 24-hour average PM_{2.5} concentration under the maximum use of credits scenario would result roughly in a doubling of the PM_{2.5} impact compared with the impact predicted for the proposed project. The increase in PM_{2.5} (and PM₁₀) resulted from increased emissions of both NO_x and directly emitted particulates.

Under the maximum use of credits scenario, greater amounts of health impacts would be foregone including 34, 79 and 81 percent increases in mortality, pulmonary impacts, cardiac response and lost activity by 2014, 2023 and 2030 respectively.

TABLE 8-5
Maximum Use of Credits Regional PM_{2.5} and PM₁₀ Impacts

Year	Basin Annual PM _{2.5} (µg/m ³)	Basin Annual PM ₁₀ (µg/m ³)	Basin Daily PM _{2.5} (µg/m ³)	Basin Daily PM ₁₀ (µg/m ³)	Coachella Valley Annual PM _{2.5} (µg/m ³)	Coachella Valley Annual PM ₁₀ (µg/m ³)	Coachella Valley Daily PM _{2.5} (µg/m ³)	Coachella Valley Daily PM ₁₀ (µg/m ³)
2014	0.08	0.18	0.7	1.0	0.02	0.02	0.1	0.1
2023	0.24	0.53	2.3	3.4	0.05	0.05	0.2	0.2
2030	0.38	0.83	3.5	5.2	0.08	0.08	0.4	0.4

Localized concentrations of pollutants from individual facilities using offsets would be the same as reported in Chapter 4.

Health Effects

Using the same methodology as described in subchapter 4.0, the SCAQMD staff calculated the health effects from the emissions attributed to the maximum use scenario. Because the maximum use scenario assumes growth that far exceeds the growth analyzed in the 2007 AQMP, this scenario would result in substantial adverse health effects, as compared with the health effects that would occur under the proposed project.

TABLE 8-6

Maximum Use Scenario's Estimated Foregone PM2.5 and PM10 Health Impacts

	Mortality Deaths (people)	Acute Bronchitis (people)	Chronic Bronchitis (people)	Non-fatal Heart Attacks (people)	Upper/Lower Respiratory (people)	Emergency Room Visits	Hospital Admissions (people)	Minor Restricted Activity Days	Annual Work Loss (days)
Year 2014	52	93	28	45	1,978	17	21	36,643	6,387
Year 2023	168	303	90	146	6,435	55	67	119,182	20,775
Year 2030	259	466	138	225	9,898	86	104	183,334	31,958

The maximum credit use scenario resulted in overall nominally lower foregone ozone health benefits than for the proposed project. This is because of a different ratio of VOC to NOx, as explained under Table 8.2.

TABLE 8-7

Estimated Health Effects from the Maximum Use Scenario's Ozone Impacts

Year	Mortality Premature Deaths (people)	Hospital Admissions (people)	Minor Restricted Activity (days)	School Absences (days)
2014	2	10	6,987	7,364
2023	7	40	28,133	29,652
2030	16	98	68,828	72,544

Toxic Impacts

Increased VOC and particulate emissions resulting from the maximum use of credits scenario would result in a greater toxic risk. The foregone benefit of four fewer additional cases of cancer in a population of one million individuals that are exposed over a 70-year lifetime for 2030 represents approximately one percent of the estimated 2030 risk from all sources in the Basin.

TABLE 8-8

Maximum Use of Credits Estimated Regional Foregone Toxic Risk

Year	Project Toxic Impact: Risk Reduction Not Achieved (Cases of Cancer)
2014	1.72
2023	5.57
2030	8.58

Visibility

Under the maximum use of credits emissions scenario, visual range would be reduced beyond that of the proposed project by approximately one-half of a mile in 2030, as compared to a baseline visual range of 40 miles or more. The foregone visibility improvement would not result in a significant change in visibility perception as measured by deciviews since the maximum impact is about 2-tenths of a deciview, and EPA's significance threshold is one-half of a deciview.

TABLE 8-9

Visibility Improvements Foregone under the Maximum Use Scenario Measured in Deciviews and Visual Range (Miles)

Area Impacted	Classification	Difference in Deciviews	Difference in Miles
2014			
Agua Tibia	Class-I Wilderness	0.008	-0.034
San Gabriel	Class-I Wilderness	0.021	-0.095
Cucamonga	Class-I Wilderness	0.017	-0.082
San Gorgonio	Class-I Wilderness	0.010	-0.064
San Jacinto	Class-I Wilderness	0.008	-0.050
Joshua Tree	Class-I Wilderness	0.008	-0.052
Rubidoux	District Monitoring	0.000	0.000
2023			
Agua Tibia	Class-I Wilderness	0.030	-0.120

TABLE 8-9 (Concluded)
Visibility Improvements Foregone under the Maximum Use Scenario
Measured in Deciviews and Visual Range (Miles)

Area Impacted	Classification	Difference in Deciviews	Difference in Miles
San Gabriel	Class-I Wilderness	0.076	-0.340
Cucamonga	Class-I Wilderness	0.057	-0.282
San Gorgonio	Class-I Wilderness	0.033	-0.204
San Jacinto	Class-I Wilderness	0.028	-0.168
Joshua Tree	Class-I Wilderness	0.022	-0.139
Rubidoux	District Monitoring	0.163	-0.300
2030			
Agua Tibia	Class-I Wilderness	0.049	-0.203
San Gabriel	Class-I Wilderness	0.112	-0.505
Cucamonga	Class-I Wilderness	0.096	-0.470
San Gorgonio	Class-I Wilderness	0.049	-0.296
San Jacinto	Class-I Wilderness	0.041	-0.245
Joshua Tree	Class-I Wilderness	0.033	-0.204
Rubidoux	District Monitoring	0.221	-0.400

Greenhouse Gases

The GHG emissions analysis for the maximum use scenario is based on the same methodologies as is used to determine greenhouse gas emissions attributed to the proposed project in Chapter 4.

Table 8-10 provides the estimated SO_x emissions from the maximum use scenario and applies the ratio factors described in Chapter 4 to calculate the GHG emissions from the maximum use scenario.

TABLE 8-10
SO_x Emissions and Greenhouse Gas Emissions from the Maximum Use Scenario

Attainment Year Periods	SO_x Emissions (tons/day)	SO_x Emissions (tons/year)	AQMP SO_x to GHG Emissions Ratio	GHG Emissions (million MT CO₂ eq /year)
2007-2030	2.33	850.5	0.0824	70.08

CHAPTER 9

ACRONYMS

µg/m ³	microgram per cubic meter
AB	Assembly Bill
afy	acre-feet per year
AIRFA	American Indian Religious Freedom Act
ALUC	Airport Land Use Commission
AMSL	above mean sea level
AQMP	Air Quality Management Plan
ARPA	Archaeological Resources Protection Act
ATF	Bureau of Alcohol, Tobacco, Firearms and Explosives
AWOS	Automated Weather Observing System
BACT	Best Available Control Technology
BARCT	Best Available Retrofit Control Technology
Basin	South Coast Air Basin
BAT	Best Available Technology Economically Achievable
BCT	Best Conventional Control Technology
BLM	Bureau of Land Management
BMP	Best Management Practice
BNSF	Burlington Northern Santa Fe Railway
BP	before present
BTU	British Thermal Unit
BUR	Bob Hope Airport
Bwh	dry-hot desert climate
Bwhh	dry-very hot desert climate
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards

CAFE	Corporate Average Fuel Economy
Cal/EPA	California Environmental Protection Agency
CalARP	California Accidental Release Prevention
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code
CCA	California Coastal Act
CCC	California Coastal Commission
CDC	California Department of Conservation
CDF	California Department of Forestry and Fire Protection
CDFG	California Department of Fish and Game
CDPR	California Department of Parks and Recreation
CEC	California Energy Commission
CEDD	California Economic Development Department
CEQ	Council on Environmental Quality
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CESA	California Endangered Species Act
CFCP	California Farmland Conservancy Program
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH ₄	methane

CHL	California Historical Landmarks
CHP	California Highway Patrol
CIWMB	California Integrated Waste Management Board
CLG	Certified Local Government
CMA	Congestion Management Agency
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
CPUC	California Public Utilities Commission
CRA	Colorado River Aqueduct
CSE	Countywide Siting Element
CSI	California Solar Initiative
CT	conversion technologies
CUPA	Certified Uniform Program Agencies
CWA	Clean Water Act
dB	decibel
dBA	“A”-weighted decibel
DG	distributed generation
DNL	Day-Night Average Noise Level
DOF	Department of Finance
DPH	Department of Public Health
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources

EGF	Electric Generating Facility
EIR	Environmental Impact Report
EPAct	Energy Policy Act
EQIP	Environmental Quality Incentives Program
ERC	Emissions Reduction Credit
ERPG	Emergency Response Planning Guideline
FAA	Federal Aviation Administration
FBI	Federal Bureau of Investigation
FDE	Final Determination of Equivalency
FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FFV	Flex fuel vehicles
FHWA	Federal Highway Administration
FPP	Farmland Protection Program
FPPA	Farmland Protection Policy Act
FRA	Federal Rail Administration
FSZ	Farmland Security Zone
FTA	Federal Transit Administration
FUA	Fuel Use Act
GHG	Greenhouse gas
GMC	Growth Management Chapter
HABS	Historic American Building Survey
HFC	Hydrofluorocarbon
HHWE	Household Hazardous Waste Element

HI	Hazard Index
HID	High intensity discharge
HOT	High-occupancy toll
HOV	High-occupancy vehicle
HSA	Historic Sites Act
HUC	Hydrologic Unit Code
HWMP	Hazardous Waste Management Plan
IOU	Investor-owned utilities
IS	Initial Study
kWh	kiloWatt-hour
LAA	Los Angeles Aqueduct
LADWP	Los Angeles Department of Water and Power
LAER	Lowest achievable emission rate
LAFCO	Local Agency Formation Commission
LAX	Los Angeles International Airport
LCFS	Low Carbon Fuel Standard
LCP	Local Coastal Program
LEA	Local Enforcement Agency
LED	Light-emitting diode
L_{eq}	Energy-Equivalent Noise Level
LGB	Long Beach Airport
L_{max}	Maximum Measured Noise Level
LOS	Level of Service
LUP	Land Use Plan
MBTA	Migratory Bird Treaty Act

MCL	Maximum Contaminant Level
MDAB	Mojave Desert Air Basin
MeTHF	methylnetrahydrofuran
Metro	Los Angeles County Metropolitan Transportation Authority
MM	Modified Mercalli
mm/yr	millimeters per year
MMT CO ₂ e	million metric tons of carbon dioxide equivalent
MPO	Metropolitan Planning Organization
MRF	Material Recovery Facility
MRZ	Mineral Resource Zone
MSHCP	Multi-Species Habitat Conservation Plan
MW	megawatts
MWD	Metropolitan Water District of Southern California
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission
NAICS	North American Industrial Category System
NCCP	Natural Communities Conservation Program
NCP	National Contingency Plan
NDFE	Non-Disposal Facility Element
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NHL	National Historic Landmarks
NHPA	National Historic Preservation Act

NNI	no net increase
NO	Nitric oxide
NO ₂	Nitrogen dioxide
NOE	Notice of Exemption
NOP	Notice of Preparation
NO _x	Nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPDWR	National Primary Drinking Water Regulations
NPL	National Priorities List
NPPA	Native Plant Protection Act
NPS	National Parks Service
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NSR	New Source Review
O ₃	Ozone
OCHCA	Orange County Health Care Agency
OCTA	Orange County Transportation Authority
OEHHA	Office of Environmental Health Hazard Assessment
OES	Office of Emergency Services
OHP	Office of Historic Preservation
ONT	Ontario International Airport
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PAH	Polynuclear aromatic hydrocarbons
Pb	Lead

PDE	Preliminary Determination of Equivalency
PEA	Program Environmental Assessment
PFC	Perfluorocarbon
PHI	Points of Historical Interest
PM10	Particulate matter 10 microns in diameter or less
PM2.5	Particulate matter 2.5 microns in diameter or less
PMD	Palmdale Regional Airport
POTW	Publicly-Owned Treatment Works
ppm	Parts per million
PPV	Peak Particle Velocity
PRC	Public Resources Code
PURPA	Public Utilities Regulatory Policies Act
PVMRM	Plume volume molar ratio method
Qfs	Qualifying facilities
RAC	Rubberized asphalt concrete
RCPG	Regional Comprehensive Plan and Guide
RCRA	Resource Conservation and Recovery Act
RELOOC	Regional Landfill Options for Orange County
RFS	Renewable Fuel Standard
RHNA	Regional Housing Needs Assessment
RIV	March Inland Port
RMP	Regional Mobility Element
RMP	Risk Management Programs
RMS	Root mean square
ROC	Reactive organic compound

ROG	Reactive organic gas
RPS	Renewables Portfolio Standard
RTA	Riverside Transit Agency
RTIP	Regional Transportation Improvement Program
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SANBAG	San Bernardino Associated Governments
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SBD	San Bernardino International Airport
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCHWMA	Southern California Hazardous Waste Management Authority
SCRRA	Southern California Regional Rail Authority
SDG&E	San Diego Gas and Electric Company
SDWA	Safe Drinking Water Act
SEA	Significant Ecological Area
SEDAB	Southeast Desert Air Basin
SEL	Sound Exposure Level
SF ₆	Sulfur hexafluoride
SHPO	State Historic Preservation Office
SHRC	State Historical Resources Commission
SIP	State Implementation Plan
SMARA	Surface Mining Reclamation Area Act

SNA	John Wayne Airport
SO ₂	Sulfur dioxide
SONGS	San Onofre Nuclear Generating Station
SOV	Single-occupancy vehicle
SO _x	Sulfur oxides
SPCC	Spill Prevention Containment and Countermeasures
SRA	Source Receptor Area
SRRE	Source Reduction and Recycling Element
SSAB	Salton Sea Air Basin
STC	Short-term credits
SWFP	Solid Waste Facility Permits
SWP	State Water Project
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic air contaminant
TDA	Tire-derived aggregate
TDM	Transportation Demand Management
TEA-21	Transportation Equity Act for the 21st Century
TMDL	Total Maximum Daily Load
TOG	Total organic gas
TSCA	Toxic Substances Control Act
TSD	Technical support document
TSDF	Treatment, Storage, and Disposal Facilities
UBC	Uniform Building Code
UCLA	University of California Los Angeles

USACE	United States Army Corps of Engineers
USBR	United States Bureau of Reclamation
USC	United States Code
USDA	United States Department of Agriculture
USDOT	United States Department of Transportation
USEPA	United States Environmental Protection Agency
USFS	United States Forest Service
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	Underground storage tank
VCV	Southern California Logistics Airport
VOC	Volatile organic compounds
WDR	Water Discharge Requirements

CHAPTER 10 – REFERENCES

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