3 REVISIONS AND CORRECTIONS TO THE DRAFT EIR

3.1 INTRODUCTION

This chapter includes revisions to the text in the Draft EIR following its publication and public review. The changes are presented in the order in which they appear in the original Draft EIR and are identified by Draft EIR page number. The changes shown in this chapter are the result of comments received on the Draft EIR that resulted in text modifications or corrections that occurred after circulation of the Draft EIR for public review and comments, and Placer County staff-initiated text changes. Revisions are shown as excerpts from the Draft EIR text, with strikethrough (~~strikethrough~~) text for deletions and underline (underline) text for additions.

3.2 REVISIONS AND CORRECTIONS TO THE DRAFT EIR

Chapter 2, Executive Summary, on page 2-1, the fourth full paragraph is revised as follows:

The proposed project would include construction of an approximately 11,000 square-foot, two-story structure that would house the power generating and emissions control equipment~~, two,~~ a 400 square-foot pad~~s~~ to ~~potentially~~ accommodate a generator step-up transformer ~~and phase-shifting equipment (if final design deemed necessary)~~, and an approximately one-acre material storage area. The storage area would include a 7,000 square-foot open air pole barn structure to allow materials to dry before use in the energy generation process. Additional onsite improvements would include eight parking spaces, a paved vehicle circulation area that includes new driveways on Cabin Creek Road and the access road to Tahoe Area Regional Transit (TART) and County Department of Public Works (DPW) facilities located on the site, a paved haul road south of the material storage area, stormwater treatment facilities (including an infiltration trench and detention basin), retaining walls, and utility improvements/extensions.

Chapter 2, Executive Summary, on page 2-24, the text of Impact 13-3 in Table 2-1 is revised as follows:

Impact 13-3. Potential Long-Term Degradation of Water Quality. Operation of the project would increase the intensity of use on the site, which could introduce new storm water pollutant sources. These pollutant sources could include oils and greases, petroleum hydrocarbons (gas and diesel fuels), nitrogen, phosphorus, and heavy metals. Pesticides, herbicides, and other landscape maintenance products could also be present and could adversely affect the quality of the site's storm water discharges. Additionally, there may be need for pretreatment of gasification-created wastewater prior to discharge to the regional sewer system. Compliance with the pre-treatment requirements of T-TSA would prevent significant environmental impacts to water quality from any wastewater discharged to T-TSA's system. However, ~~T~~the potential water quality degradation associated with polluted stormwater runoff and the resultant effect on water quality would be considered **potentially significant.**

Chapter 2, Executive Summary, on page 2-26, the text of Impacts 15-1 and 15-2 in Table 2-1 is revised as follows:

Impact 15-1. Water Supply Impacts. Water supply on the site is limited to the capacity of the existing well and pump. The Applicant would select a vendor whose gasification technology could conform to water supply capabilities of the well and water supply system serving the site. Additionally, the project includes construction of a second well to provide redundant supply and reliability in the remote event the existing well would fail. The new well would be required to meet water quality and quantity criteria of the Placer County Environmental Health Department. Water used for plant operation would also be charged against California's water allocation under TROA, if and when it goes into effect. The additional water consumed by the plant would not be at a level that would cause California's TROA allocation to be exceeded. Because adequate well capacity and redundant

water supply would be provided with implementation of the project, the project's water supply impacts would be **less than significant.**

Impact 15-2. Wastewater Conveyance and Treatment Capacity Impacts. The T-TSA advanced water reclamation plant has a permitted available capacity, on a first-come, first-served basis, of approximately 3.2 mgd. At maximum peak use flow, the biomass facility would discharge 14,400 gpd, which would be less than 0.5 percent of the T-TSA's available capacity. Therefore, adequate treatment capacity is available to serve the proposed biomass facility and no new facilities would be required. This impact would be **less than significant.**

Chapter 2, Executive Summary, on page 2-29, the text of the first paragraph of Mitigation Measure 16-4 is revised as follows:

Mitigation Measure 16-4. The Applicant shall regularly compact the fuel piles to minimize fire risk in storage piles. The Applicant shall also prepare detailed written procedures for the management of biomass piles to prevent inadvertent combustion and fires, and that minimize vectors, odors, litter, and human contact with, inhalation, ingestion, and transportation of dust, particulates, and pathogenic organisms. The written procedures shall outline the specific measures that would be implemented to reduce the total pile storage area, and to prevent potential pile fires due to spontaneous combustion. The written procedures shall be subject to review and input by the County LEA ~~that oversees the SWFP for the site~~, PCAPCD, and the Truckee Fire Protection District prior to initiating operations at the site. These measures shall include at a minimum the following:

Chapter 3, Project Description, on page 3-11, the text of Section 3.4.3 is revised as follows:

3.4.3 WOODY BIOMASS FUEL SUPPLY

The fuel supply for the proposed project would be solely woody biomass, derived from a variety of sources including forest-sourced material (hazardous fuels residuals [i.e., woody biomass material that poses a substantial fire threat to human or environmental health], forest thinning and harvest residuals [i.e., woody biomass generated from forest maintenance and restoration activities], and clean Wildland Urban Interface (WUI; generally areas within ¼-mile of urban centers where materials would otherwise be piled and burned)-sourced waste materials from ~~residential and commercial property~~ defensible space clearing ~~and property management~~ activities; materials that would otherwise be piled and burned~~, which would include brush and yard clippings, tree trimmings and pine needles)~~. The facility would be certified as a renewable energy facility by the CEC based on California Public Resources Code (PRC) Section 25740, 25741 et seq. ~~the proposed sole use of renewable woody biomass as its only fuel source.As stated in California Public Resources Code (PRC) Section 25743(f), the CEC categorizes facilities generating electricity from biomass energy as in-state renewable electricity generation facilities if they report to the CEC the types and quantities of biomass fuels used and certify to the satisfaction of the Commission that the fuel utilization meets certain requirements including:~~

- ~~have been harvested pursuant to an approved timber harvest plan prepared in accordance with the Z'berg-Nejedly Forest Practice Act of 1973 (Chapter 8 [commencing with Sec. 4511] of Part 2 of Division 4, California PRC);~~
- ~~have been harvested for the purpose of forest fire fuel reduction or forest stand improvement; and~~
- do not transport or cause the transportation of species known to harbor insect or disease nests outside zones of infestation or current quarantine zones, as identified by the California Department of Food and Agriculture or CAL FIRE, unless approved by those agencies.

Chapter 3, Project Description, on page 3-13, the text of the fourth full paragraph is revised as follows:

The fuel blend for the facility assumes that 75 percent of the facility's fuel usage would be sourced from hazardous fuels treatment activities, with the balance being made up of forest thinning residuals and WUI-sourced materials (primarily tree trimmings ~~and pine needles~~) (Placer County Planning Department 2011).

Chapter 3, Project Description, on page 3-14, the text under the heading "WUI-Sourced Material Specifications" is revised as follows:

WUI-SOURCED MATERIAL SPECIFICATIONS

WUI waste would include primarily wood waste ~~from tree trimming and yard clean up (pine needles) for~~ from defensible space activities~~purposes~~. WUI-sourced material used at the facility would be required to meet the following fuel specifications developed by the Applicant (Placer County Planning Department 2010):

Chapter 3, Project Description, on page 3-21, the text of the fourth full paragraph is revised as follows:

The project would also require a connection using underground conduit to the existing power line to bring power generated at the site to the Calpeco's transmission system (Hutton, pers. comm., 2011). Based on discussions with representatives of Calpeco (which owns and maintains the lines), the existing power line would have capacity to accommodate electricity generated at the project site such that offsite power line improvements (e.g., new poles and lines) would not be necessary (Carson, pers. comm., 2011). The proposed project may require the construction of a generator step-up transformer ~~and phase shifting pads and equipment~~ that would be used to transfer power at the correct voltage to the grid and visible disconnect switches, but no offsite electrical improvements (i.e., power line extensions) would be required. During latter phases of design, interconnection studies would be required to verify the adequacy of the capacity of the distribution line. If the interconnection studies determined that offsite improvements are indeed necessary, those improvements would be subject to separate and subsequent environmental review prior to construction of the biomass facility.

Chapter 3, Project Description, on pages 3-23 and 3-24, the text of Section 3.5.2 is revised as follows to clarify permitting details:

3.5.2 OTHER AGENCIES USING THE EIR, AND PERMITTING AND CONSULTATION REQUIREMENTS

Other potential permits and/or approvals that may be required by agencies other than Placer County for development of the proposed project include, but are not limited to, the following:

- Funding authorization (DOE) (DOE's separate NEPA process documentation is described in Chapter 1, Introduction)
- Sewer Connection Permit (TCPUD/T-TSA)
- Construction/Industrial Storm Water Permit (Lahontan Regional Water Quality Control Board)
- Fire Protection Agency Pre-Approval (Truckee Fire Protection District)
- ~~Timberland Conversion Permit~~ Notice of Conversion Exemption to filing a Timber Harvest Plan (California Department of Forestry and Fire Protection)
- ~~Solid Waste Facility Permit (SWFP) or an~~ Amendment to the existing Solid Waste Facility Permit (SWFP) permit for the Eastern Regional MRF and Transfer Station ~~SWFP~~ (see below) (California Integrated Waste Management Board/CalRecycle and Local Enforcement Agency)

While the issuance of the above permits and/or approvals is not contingent upon EIR certification, the applicable permitting agencies may review information contained in the EIR as part of the approval process.

The proposed Cabin Creek Biomass Facility would ~~may~~ be exempt from the requirement for a SWFP (Tornatore , pers. comm., 2012) that would be issued by the Placer County Local Enforcement Agency (LEA) (in this case the Placer County Department of Health and Human Services is the agency that implements CalRecycle's regulations). According to PRC Section 40201, the proposed biomass gasification plant would not be considered a "waste-to-energy" or "co-generation" plant and would not be subject to permitting as a solid waste facility (CIWMB 2007). Additionally, the proposed facility would be exempt from solid waste permitting requirements as it would pass CalRecycle's "Three-Part Test". In order to qualify for this exclusion from CalRecycle's SWFP permitting requirements, (1) the site must be receiving material that has been source separated (by the generator) or separated for reuse (at a centralized facility – such as a MRF) prior to receipt at the site; (2) less than 1 percent of the material must be putrescible and not causing a nuisance; and, (3) less than 10 percent of the residual leaving the site is being sent to disposal. The proposed biomass facility would meet the requirements of the "Three-Part Test" and therefore would be excluded from SWFP permitting.

~~However, t~~The proposed facility would be located within the boundaries of an existing SWFP for the Eastern Regional MRF and Transfer Station and an administrative amendment to that SWFP may be needed to recognize the proposed biomass plant and operations. Because the ~~gasification~~ facility may receive separated wood waste from the Eastern Regional MRF and Transfer Station, a Report of Facility Information (RFI) amendment for the MRF may be needed. While the biomass facility is not within the permitted boundaries of the closed landfill, it is within 1,000 feet of the landfill and may require a revision to the Closure/Postclosure Maintenance Plan (CPCMP) for the landfill.

~~Additionally, because he proposed biomass facility would use a gasification process (not a direct combustion process), it would be subject to notification requirements under Title 14, Natural Resources Division 7, California Integrated Waste Management Board, Chapter 3.1, Compostable Materials Handling Operations and Facilities Regulatory Requirements (Loane, pers. comm. 2012). ("Biomass conversion", which is an excluded activity under Section 17855, Excluded Activities (17855(a)(5)(C)), is defined under PRC 40106 as controlled combustion.)Notification requirements include written notification to the LEA from the operator describing the facility's eligibility under Section 18103 and the facility's operations, documentation that the local planning department has been notified of the intent to commence operations, and proof of compliance with CEQA.~~

Chapter 5, Biological Resources, on page 5-19, the text of the last paragraph is revised as follows:

The proposed biomass facility would use woody biomass derived from forest sources and clean urban sources. The forest sources would include forest residuals generated from hazardous fuel reduction, forest thinning for stand-level management, wildlife habitat enhancement, or other forest management activities conducted by the Tahoe National Forest (TNF) and Lake Tahoe Basin Management Unit (LTBMU) of USFS. Placer County's intention is to primarily use biomass generated from these USFS projects especially in light of the substantial sources of these materials to meet the facilities needs over the next 10 to 15 years~~; however, over its lifetime, the biomass facility may use clean urban sources of fuels, such as tree trimmings, pine needles, and clean (untreated) construction and demolition wood (e.g., pallets), and forest sources on state or private land as well~~. The facility would not accept any urban wood waste from building materials or other potential sources that have been treated (e.g., painted or pressure-treated wood).

Chapter 9, Air Quality, on page 9-3, the text of the last sentence is revised as follows:

Note that although the Truckee monitoring station indicates that the local Truckee area is in attainment for ozone, the western portion of Nevada County, including Truckee, is classified as non-attainment for ozone according to the ARB (ARB 2011; ARB no date). ~~the MCAB is classified as non-attainment for ozone as a result of ozone levels measured at other monitoring stations throughout the MCAB.~~

Chapter 13, Hydrology and Water Quality, on page 13-12, the text of Impact 13-3 is revised as follows:

Impact 13-3	**Potential Long-Term Degradation of Water Quality.** Operation of the project would increase the intensity of use on the site, which could introduce new storm water pollutant sources. These pollutant sources could include oils and greases, petroleum hydrocarbons (gas and diesel fuels), nitrogen, phosphorus, and heavy metals. Pesticides, herbicides, and other landscape maintenance products could also be present and could adversely affect the quality of the site's storm water discharges. Additionally, there may be need for pretreatment of gasification-created wastewater prior to discharge to the regional sewer system. Compliance with the pre-treatment requirements of T-TSA would prevent significant environmental impacts to water quality from any wastewater discharged to the T-TSA system. However, ~~T~~the potential water quality degradation associated with polluted stormwater runoff and the resultant effect on water quality would be considered **potentially significant**.

Chapter 13, Hydrology and Water Quality, on page 13-13, the text of the last sentence of the third full paragraph is revised as follows:

Prior to discharge, this water would be pre-treated to the standards required by T-TSA~~TTSD~~ through the use of activated charcoal filters.

Chapter 13, Hydrology and Water Quality, on pages 13-13 and 13-14, the text of the last full paragraph starting on page 13-13 is revised as follows:

Preliminary calculations of pre-and post-project flows were calculated by Wood Rodgers (April 2012). Pre-project flows are estimate to be ~~13.3~~12.9 cubic feet per second (cfs) for the 10-year event and ~~10~~22.4 cfs for the 100-year event. The 10-year and 100-year post project flows are estimated to result in a 3% and 1% increase respectively, in flows from pre-development levels. This results in an approximate post-development increase in flow of 0.4 cfs for the 10-year event and 0.3 cfs for the 100-year event.

Chapter 15, Public Services and Utilities, on page 15-2, the text of the first full paragraph is revised as follows:

The Tahoe City Public Utility District (TCPUD) provides sanitary sewer service to the existing MRF and Transfer Station. Placer County owns the collection system that serves the existing MRF and Transfer Station. The boundaries of the District lie within both Placer and El Dorado Counties, extending from Emerald Bay to Dollar Hill, and along the Truckee River to the Nevada County line. Sewage collected from the site discharges into a TCPUD collection manhole, and then into the Tahoe-Truckee Sanitation Agency (T-TSA) Truckee River Interceptor, both of which are located in the Truckee River corridor near SR 89. The T-TSA Truckee River Interceptor ranges in size from 24 inches to 42 inches and supplies sewage to T-TSA advanced water reclamation plant located in Truckee. ~~Sewage collected from the site flows in a 36" pipe along the Truckee River corridor to the Tahoe-Truckee Sanitation Agency (T-TSA) wastewater treatment plant located on the eastern side of Truckee. The Tahoe-Truckee Sanitation Agency (~~T-TSA~~)~~ was founded in 1972 in response to the Porter Cologne Water Quality Control Act, promulgated to protect Lake Tahoe and Truckee River water quality. T-TSA provides regional wastewater treatment service to several Tahoe-area communities through the Agency's five-member sewage collection districts. The member agencies served by T-TSA facilities include:

Chapter 15, Public Services and Utilities, on page 15-4, the text of Section 15.2.1 is revised as follows:

15.2.1 FEDERAL

~~There are no federal plans or policies addressing public services and utilities that pertain to the project.~~

TRUCKEE RIVER OPERATING AGREEMENT

The Truckee River Operating Agreement (TROA), signed on September 6, 2008, was developed to formalize, regulate, and monitor water rights and water use within the Tahoe Region, the Truckee River Watershed, and the final outflow areas of Pyramid Lake and the Carson River. TROA was signed by: the U.S. Department of the Interior; the U.S. Department of Justice; the states of California and Nevada; the cities of Fernley, Sparks, and Reno; the Pyramid Lake Paiute Tribe; Washoe County; Sierra Pacific Power Company, and seven public utility and/or water districts. This agreement, which represents the culmination of 18 years of negotiation, was designed to establish minimum storage volumes for and improve the operational flexibility of the Truckee River reservoirs. Under TROA, the interstate allocation caps total groundwater pumping in California at 32,000 acre-feet per year in the Truckee River Basin, less whatever surface water is diverted (surface water is currently limited to 10,000 acre-feet per year) (U.S. Bureau of Reclamation and Department of Water Resources 2008: p. 3-130). Implementation of TROA will involve hydrologic and water accounting data and tracking. While TROA has been signed, it is not yet in effect. Several actions, including court approvals in California and Nevada and approval of water rights change petitions, must be completed before TROA can be implemented.

Chapter 15, Public Services and Utilities, on pages 15-7 and 15-8, the text of Impact 15-1 is revised as follows:

Impact 15-1	**Water Supply Impacts.** Water supply on the site is limited to the capacity of the existing well and pump. The Applicant would select a vendor whose gasification technology could conform to water supply capabilities of the well and water supply system serving the site. Additionally, the project includes construction of a second well to provide redundant supply and reliability in the remote event the existing well would fail. The new well would be required to meet water quality and quantity criteria of the Placer County Environmental Health Department. Water used for plant operation would also be charged against California's water allocation under TROA, if and when it goes into effect. The additional water consumed by the plant would not be at a level that would cause California's TROA allocation to be exceeded. Because adequate well capacity and redundant water supply would be provided with implementation of the project, the project's water supply impacts would be **less than significant.**

It is estimated that the maximum (peak use) flow for the facility would be 10 gpm (14,400 gpd). The existing maximum water demand at the site (without the project) is approximately 60,000 gpd. When added to the proposed project maximum demand, a total of approximately 74,400 gpd would be required. The frequency with which this rate of water would be required would be rare and would require that peak demands from several onsite facilities (Eastern Regional MRF, Transfer Station, TART facilities) occur simultaneously.

In order to install a second well for the water supply system, the Domestic Water Supply Permit for the existing water system would require amendment. The permit amendment requires the following steps: 1) obtaining a well construction permit; 2) testing the new well to make a determination that the new well can provide adequate quantity and quality; and 3) applying for an amendment to the Water Supply Permit (Ramsey, pers. com. 2012).

The quantity of water used and treated would also be charged against the California allocation for the Truckee River Basin under TROA, when and if it goes into effect. In California, as of 2008 groundwater use in the Truckee River Basin was 10,370 acre-feet per year (of which 2,800 acre-feet was surface water use) (U.S. Bureau of Reclamation and Department of Water Resources 2008). Under TROA, the interstate allocation caps the total groundwater pumping volume in the Truckee River Basin for California at 32,000 acre-feet per year, less whatever surface water is diverted. Water consumption on an annual basis for the proposed project has not been calculated. Peak demand estimates described above are included for informational purposes and to determine the adequacy of the well and pump to accommodate the proposed project. Depending on vendor selection, average water use would be well below the projected peak use. Therefore, it is difficult to predict the annual water usage of the proposed biomass facility at the site and the project's effect on California's TROA allocation for the Truckee River Basin, if and when it goes into effect. For comparative purposes, even under an unrealistic scenario whereby the plant were to operate at a continuous peak level (up to 14,400 gpd for 365 days of the year, which is equivalent to 15.8 acre-feet per year), the proposed project would add incrementally (0.05 percent of the total allocation, and 0.07 percent of the remaining allocation as of 2008) to groundwater pumping against the TROA allocation, but would not cause the allocation cap to be exceeded.

As described in the project description, the County would select a vendor whose gasification technology could conform to water supply capabilities of the well and water supply system serving the site. Additionally, the project includes construction of a second well to provide redundant supply and reliability in the remote event the existing well would fail. Further, the new well would be required to meet water quality and quantity criteria of the Placer County Environmental Health Department. Because adequate well capacity and redundant water supply would be provided with implementation of the project, the project's water supply impacts would be **less than significant.**

Chapter 15, Public Services and Utilities, on page 15-8, the text of Impact 15-2 is revised as follows:

Impact 15-2	**Wastewater Conveyance and Treatment Capacity Impacts.** The T-TSA advanced water reclamation plant has a permitted available capacity, on a first-come, first-served basis, of approximately 3.2 mgd. At maximum peak use flow, the biomass facility would discharge 14,400 gpd, which would be less than 0.5 percent of the T-TSA's available capacity. Therefore, adequate treatment capacity is available to serve the proposed biomass facility and no new facilities would be required. This impact would be **less than significant**.

An existing sanitary sewer collection system serves the existing Eastern Regional MRF and Transfer Station operations and TART and DPW facilities adjacent to the southern portion of the site. This collection system, which is owned by Placer County, would be extended to the site to serve the project. Currently, the site's sanitary sewer collection system ~~connects with the NTPUD~~discharges into a TCPUD collection manhole, and then into T-TSA's Truckee River Interceptor, both of which are located in the Truckee River corridor near SR 89. ~~sewer main, which runs along SR 89.~~ Wastewater is conveyed via ~~NTPUD main and~~ the T-TSA~~TCPUD~~ sewer main to the T-TSA WRP located east of the Town of Truckee. As part of the project, the existing sewer line would be extended to the site within the existing road alignment. The impacts of this improvement are evaluated throughout this EIR. No additional wastewater conveyance improvements would be required to convey project wastewater to the T-TSA reclamation plant.

Chapter 16, Hazardous Materials and Hazards, on page 16-15, the text of the first paragraph of Mitigation Measure 16-4 is revised as follows:

Mitigation Measure 16-4

The Applicant shall regularly compact the fuel piles to minimize fire risk in storage piles. The Applicant shall also prepare detailed written procedures for the management of biomass piles to prevent inadvertent combustion and fires, and that minimize vectors, odors, litter, and human contact with, inhalation, ingestion, and transportation of dust, particulates, and pathogenic organisms. The written procedures shall outline the specific measures that would be implemented to reduce the total pile storage area, and to prevent potential pile fires due to spontaneous combustion. The written procedures shall be subject to review and input by the County LEA ~~that oversees the SWFP for the site~~, PCAPCD, and the Truckee Fire Protection District prior to initiating operations at the site. These measures shall include at a minimum the following:

Chapter 18, Other CEQA Sections, on page 18-26, the text of the last two paragraphs is revised as follows:

~~Adoption and implementation of the proposed project would only result in one potentially significant and unavoidable impact associated with cumulative toxic air contaminant (TAC) concentrations. While the project would not result in significant impacts related to TAC concentrations in and of itself, it is possible that the levels of health risk exposure from the proposed project, in combination with health risk exposure of other nearby TAC-emitting facilities, could exceed acceptable levels which would be considered a significant cumulative impact. No additional feasible mitigation would be available to reduce this impact or the project's contribution to this impact. Therefore, the project's contribution would be cumulatively considerable.~~

All ~~other~~environmental impacts of the project would be less than significant or less than significant with mitigation.

Chapter 18, Other CEQA Sections, on page 18-38, the text of the last paragraph is revised as follows:

Air districts in California develop air quality attainment plans designed to reduce emissions of ozone precursors enough to attain the federal ozone standard by the earliest practicable date. Air quality attainment plans include a multitude of air pollution control strategies. When developing air quality attainment plans, air districts account for the emissions from all present and future development in the region by relying on city and county general plans. Because the proposed project would be consistent with the land use designation in the Placer County General Plan, emissions associated with development of the project are accounted for in PCAPCD's air quality attainment plan. Also, project-related construction and operational emissions would not exceed the applicable mass emission thresholds established by PCAPCD, NSAQMD, and EDCAPCD. Though operational emissions of ROG and NO_X would exceed PCAPCD's cumulative impact thresholds of 10 lb/day, PCAPCD has confirmed that all feasible reduction measures were incorporated into the project description, as listed among the Environmental Commitments in Section 3.4.8 of the EIR, and the proposed facility would be regulated by District Rule 502 (New Source Review), which requires that the project shall meet the Best Available Control Technology (BACT) requirement to reduce emissions of ROG and NO_X (Chang, pers. comm., 2012). Moreover, the quantitative analysis in Section 9, Air Quality does not account for levels of emissions associated with the open burning of forest thinning debris and hazardous fuels in area forests that would be avoided by the operation of the biomass plant. Thus, the contribution of short-term construction and long-term operational emissions of NO_X and ROG by the proposed project, combined with other cumulative sources of ozone precursors in the region, would ~~be~~ not be cumulatively considerable.