5.1 CEQA REQUIREMENTS

CEQA requires that an EIR analyze a reasonable range of feasible alternatives that meet most or all project objectives while reducing or avoiding one or more significant environmental effects of the project. The range of alternatives required in an EIR is governed by a "rule of reason" that requires an EIR to set forth only those alternatives necessary to permit a reasoned choice (CEQA Guidelines Section 15126.6[f]). Where a potential alternative was examined but not chosen as one of the range of alternatives, the CEQA Guidelines require that the EIR briefly discuss the reasons the alternative was dismissed.

PROJECT OBJECTIVES

The alternatives to the proposed project selected for analysis in the EIR were developed to minimize significant environmental impacts while fulfilling the basic objectives of the project. As described in Chapter 2, Project Description, the following objectives have been identified for the proposed project.

1. To increase the available supply of biomass-generated electricity produced and used at the project site.

2. To efficiently utilize wood by-products that are generated during the milling of lumber at SPI sawmill facilities in Shasta County.

3. To provide excess sources of biomass energy available for sale to the local power grid.

4. To assist the State of California in reaching its goal of 20% of the State's power coming from renewable sources by 2010.

5.2 ALTERNATIVES CONSIDERED IN THIS EIR

A Notice of Preparation was circulated to the public to solicit recommendations for a reasonable range of alternatives to the proposed project. Additionally, a public scoping meeting was held during the public review period to solicit recommendations for a reasonable range of alternatives to the proposed project. No specific alternatives were recommended by commenting agencies or the general public during the NOP public review process.

Three alternatives to the proposed project were developed based on County input and the technical analysis performed to identify the environmental effects of the proposed project. The alternatives analyzed in this EIR include the following three alternatives in addition to the proposed cogeneration project.

- No Project Alternative
- Reduced Cogeneration Facility Size/On Site Materials Alternative
- Maximum Available Control Technology (MACT) Alternative

The environmental effects of each of these alternatives are identified and compared with those environmental impacts resulting from the proposed project that are identified in environmental issue areas in Chapters 3.1 through 4.0. Table 5.0-1 at the end of this section provides a comparison of the environmental benefits and detriments of each alternative and identifies the "environmentally superior" alternative.

Rejected Alternatives

In addition to the alternatives analyzed herein, other alternatives were considered, but rejected for detailed analysis. An alternative location for the proposed project was considered, but rejected since it would not achieve the project objective of increasing the available supply of biomass-generated electricity produced and used at the project site. Another alternative that was considered but rejected was an alternative site plan as an alternative layout would not avoid any of the potentially significant impacts associated with project implementation

PROPOSED PROJECT

The proposed project consists of the construction and operation of a new cogeneration power facility, including a new fuel shed, boiler building, turbine building, cooling tower, electrostatic precipitator, ash silo and electric substation, on the project site. The boiler associated with the plant would burn biomass fuel (i.e., non-treated wood and agricultural crop surpluses, as well as urban wood waste) generated by the lumber manufacturing facility on-site, regional lumber manufacturing facilities, and other biomass fuel sources to produce up to 250,000 pounds of steam per hour. The steam would be used to dry lumber in existing kilns and to power a steam turbine. The steam turbine would drive a generator that would produce up to 31 MW of electricity for on-site use as well as for sale to the local power grid. Approximately 7 MW will be used to power on-site equipment; the remainder will be sold to a public utility. The electricity that is sold would originate from the on-site electric substation and be transferred to the local power grid for distribution to the purchaser. Up to 485 acre-feet per year of groundwater would be required for the operation of the proposed cogeneration plant. A schematic flow diagram for the cogeneration facility is presented in Figure 2-6.

The existing smaller cogeneration plant on-site would be maintained as a backup facility so that the sawmill operation can be normalized during maintenance operations on the new cogeneration plant. Upon completion of the proposed project, the two on-site cogeneration plants would never operate simultaneously.

NO PROJECT ALTERNATIVE

The CEQA Guidelines (Section 15126.6[e]) require consideration of a no project alternative that represents the existing conditions, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved. For purposes of this analysis, the No Project Alternative is the continuation of the existing operations on the SPI site, which include an active lumber manufacturing facility, which is used to manufacture lumber, wood poles, and metal/machinery components; generate power through an existing biomass co-generation

facility; store and re-distribute manufacturing parts; repair trucks and machinery; and ship wood chips and lumber by truck and rail.

The existing sawmill is powered by an existing onsite four (4) mega watt (MW) wood-fired cogeneration power plant. The fuel consists of the sawdust and woodchips that are byproducts from the sawing of lumber from logs. The fuel is stored in a large pile and covered fuel bin. Conveyors move the fuel to the existing boiler and a stream driven turbine converts mechanical energy into electrical energy. Excess steam is conveyed via above-ground pipeline to the lumber kilns to dry lumber. The existing cogeneration plant also utilizes a two-cell cooling tower and ash bins. The existing wood fired boiler was completed in March 1997. The existing turbine and electrical generator was operational in December 1997. The existing generator is rated to produce 4 MW of electricity and the boiler is rated to produce 80,000 lbs of steam.

The existing lumber manufacturing facility utilizes several types of heavy equipment during its daily operations, including: log trucks, log loaders, portal cranes, hydraulic lifts, conveyors, debarkers, optical scanners, computers, wood saws, lumber sorters, chip and sawdust conveyors, utility pole manufacturing, fork lifts, dry kilns, lumber planers, lumber stackers, lumber wrappers, lumber trucks, water trucks, and rail cars. Truck and machinery repair equipment is housed in the onsite truck shop. There are also existing gas and diesel refueling stations on the site.

The metal manufacturing facility utilizes computers, plotters, metal saws, lathes, welders, cutting torches, grinders, metal presses, paint and electrical components to construct machinery to be used at SPI manufacturing facilities (both on- and off-site facilities).

The sawmill employs 153 people. Seven administrative staff support the sawmill operations. The fabrication shop has 38 employees. The pole plant has six employees. The warehouse staff includes four employees. Additionally, 31 truck drivers and four mechanics and employed.

Operations at the existing facility occur between 16 and 24 hours per day, depending on market conditions and demand.

REDUCED COGENERATION FACILITY SIZE/ON SITE MATERIALS ALTERNATIVE

This alternative includes the construction and operation of a new cogeneration facility that is smaller than the facility currently proposed by SPI, and would burn only wood waste that is generated on site by existing sawmill operations. The Anderson facility currently produces approximately 160,000 bone dry tons (BDT) of wood wastes per year of which 60,000 BDT are consumed by the existing cogeneration facility, 20,000 BDT are trucked to other biomass power plants, and the balance is trucked to other markets (e.g., wood chips to pulp mills).

Under this alternative, the new cogeneration facility would be designed and sized to burn a maximum of 160,000 BDT of wood waste per year, all of which would be generated on site. This alternative would not require the transport of wood waste from other SPI sawmills or other off-

site sources, and would reduce the existing number of truck trips that currently occur in order to transport 20,000 BDT of wood waste to other biomass power plants.

This alternative would result in a smaller boiler that produces approximately 180,000 pounds of steam per hour and potentially up to 18 MW of electricity.

MAXIMUM AVAILABLE CONTROL TECHNOLOGY ALTERNATIVE

Under this alternative the proposed project would include the construction and operation of a cogeneration facility that produces the same amount of steam and electricity as the proposed project. However, rather than implementing the currently proposed best available control technology (BACT), the project would incorporate maximum available control technology (MACT) to reduce pollutant emissions. All other aspects of the proposed project, including site design, vehicle trips, etc., would remain unchanged under this alternative.

A BACT analysis evaluates the energy, environmental, economic, and other costs associated with each potential control technology, and weighs those costs against the reduced emissions the technology would provide. A MACT analysis identifies the control technology that would provide the greatest degree of environmental protection, without consideration for economic feasibility of implementing these measures.

The proposed project proposes to incorporate BACT, which is described in greater detail in Section 3.2, Air Quality, and included in the BACT Analysis within the PSD, which is attached to this EIR as **Appendix B**. The BACT analysis includes a discussion of the available MACT for each pollutant analyzed in the BACT analysis, and discusses the economic or financial feasibility of implementing these MACT measures. Under this alternative, the following MACTs would be applied:

NOx: Selective Catalytic Reduction (SCR) Control System

CO: Catalytic Oxidation

PM10 : Mechanical collector followed by an Electrostatic Precipitator (ESP); which is the same technology as what is currently proposed by the project applicant.

ROG/VOC: Proper combustion; which is currently proposed and the only available control technology for these emission types.

SO2: Flue Gas Desulfurization System (FGD)

Beryllium: No BACT or MACT available

Potential impacts associated with this alternative are analyzed in this chapter. However, this alternative may not be financially feasible, since incorporation of MACT was determined to be financially infeasible in the PSD BACT analysis.

5.3 ENVIRONMENTAL ANALYSIS

The alternatives analysis provides a summary of the relative impact level of significance associated with each alternative for each of the environmental issue areas analyzed in this EIR. Following the analysis of each alternative, Table 5.0-5 summarizes the comparative effects of each alternative.

NO PROJECT ALTERNATIVE

Aesthetics

The No Project Alternative would leave the project site in its existing state and would not result in increases in daytime glare or nighttime lighting, and would not introduce taller structures or new buildings to the project site. As described in Section 3.1, the proposed project would result in significant and unavoidable impacts associated with degradation of the visual character of the site and the introduction of new sources of light and glare. The No Project Alternative would avoid these impacts altogether and would have less of an impact than the proposed project on aesthetics.

Air Quality and Greenhouse Gasses

The No Project Alternative would not result in any increases of emissions from project implementation above the existing environmental baseline conditions, which include existing sawmill and cogeneration operations at the SPI site. The significant and unavoidable air quality and GHG impacts identified in Section 3.2 would not occur under this alternative, since there would be no increase in employee or fuel truck trips, and no increase in cogeneration plant emissions. Additionally, temporary construction-related air quality impacts would not occur under this alternative. However, this alternative would be inferior to the proposed project in terms of meeting the goals of California's Renewables Portfolio Standard (RPS) program, which requires an increase in renewable energy sources from electricity providers, as this project would result in no increase in the amount of renewable energy provided to local utility providers by SPI.

Biological Resources

The No Project Alternative would not result in any ground disturbing or operational activities above the environmental baseline condition. As a result, potential impacts to biological resources identified in Section 3.3 would not occur under this alternative. This alternative is superior to the proposed project in terms of biological resource impacts.

Cultural Resources

The No Project Alternative would result no ground disturbing activities above the environmental baseline conditions, and would reduce the potential to disturb or destroy cultural, historic, and archaeological resources, as well as paleontological resources. While the proposed project is not anticipated to result in impacts to cultural or historical resources, the No Project Alternative would further reduce the risk of the unintentional discovery of such resources.

Geology and Soils

The No Project Alternative would result in the project site remaining in its existing condition. As described in Section 3.5, implementation of the proposed project would not result in any significant impacts related to geology and soils, but would result in the construction of new structures and accessory buildings on the project site. Therefore, the No Project Alternative would have a reduced impact on geology and soils when compared to the proposed project.

Hazards

The No Project Alternative would result in the continuation of existing operations at the project site. Section 3.6 identified potentially significant impacts related to hazards associated with operation of the proposed project, and mitigation measures that reduce these hazards to a less than significant level. Under the No Project Alternative there would be no potential increase fire risk, no potential increased risk of upset or spill of hazardous materials, and no potential impacts to emergency evacuation plans. This alternative would have a reduced impact related to hazards and hazardous materials compared to the proposed project.

Hydrology and Water Quality

The No Project Alternative would result in the continuation of existing operations at the project site, and there would be no increase in water use, groundwater pumping, or increased stormwater runoff over existing conditions. The proposed project would require the use of up to 485 acre-feet per year of groundwater, and could potentially cause less than significant impacts to area wells through drawdown and interference. This alternative would have a reduced impact related to hydrology and water quality compared to the proposed project.

Noise

As described in Section 3.8, the noise levels associated with the proposed plant will be approximately 3 dBA lower than the existing plant. This is due to the fact that the equipment is new and more efficient, the boiler and the turbine will be located within metal buildings, and the boiler will be fitted with a silencer on the steam vent. Potential traffic-related noise impacts from the proposed project would result in only negligible and unnoticeable increase in roadway noise associated with increased vehicle trips. The No Project Alternatives assumes continued operation of the existing cogeneration plant on the SPI site, which currently generates more noise than the proposed cogeneration facility would. Therefore, the No Project Alternative would have more severe noise impacts than the proposed project.

Public Services and Utilities

The No Project Alternative would result in the continuation of existing operations at the project site. The proposed project would not result in any significant impacts to public services or utilities, however, in light of the larger cogeneration facility that is proposed, there may be a minor increase in the demand for fire services in the event of an emergency. Impacts related to increased water demand are addressed in the Hydrology and Water Quality section, and implementation of the proposed project would not result in any increased water demand from a

municipal water supply, as all new water for the proposed project would come from on site wells. This alternative would have similar impacts to public services and utilities as the proposed project.

Traffic/Circulation

The No Project Alternative would not introduce additional vehicle trips onto the study area intersections identified in Section 3.10. As described in Section 3.10, implementation of the proposed project would require intersection improvements to ensure less than significant impacts to intersections under cumulative conditions. The proposed project would result in increases in daily vehicle trips on area roadways and intersections generated by fuel haul trucks and employee vehicle trips. These trip increases would not occur under the No Project Alternative. Therefore, this alternative would have reduced traffic impacts when compared to the proposed project.

REDUCED COGENERATION FACILITY SIZE/ON SITE MATERIALS ALTERNATIVE

Aesthetics

This alternative would result in the construction and operation of a slightly smaller cogeneration facility in the same location as the proposed cogeneration facility. The visual changes to the project site under this alternative would be very similar to those of the proposed project, however the new cogeneration structures would likely be slightly shorter than what is currently proposed, and would therefore intrude slightly less into the visual landscape of the project vicinity. Under this alternative, exterior lighting would be approximately the same as what is currently proposed. Even though the height of new cogeneration facility structures under this alternative would be slightly less than what is proposed, impacts to aesthetics and visual resources would be comparable under this alternative as they would be with the proposed project.

Air Quality and Greenhouse Gasses

This alternative would result in the construction and operation of a smaller cogeneration power facility compared to what is currently proposed. Temporary construction-related air quality impacts from this alternative would be approximately the same as the proposed project. However, operation of a smaller cogeneration facility would generate fewer emissions than the proposed cogeneration facility. Additionally, under this alternative there would be no increase in fuel haul truck trips bringing wood materials to and from the project site, as this alternative would use only fuel generated on site, and would eliminate the existing practice of shipping some of the wood waste currently generated on site to other biomass facilities in the region. However, under this alternative, a slightly reduced amount of excess electricity would be available for sale to a local electricity provider, which would not go as far as the proposed project would in meeting the goals of the RPS. Overall, this alternative, and the associated

reduction in emissions compared to the proposed project, would have a less severe impact on air quality and GHGs.

Biological Resources

This alternative would result in the construction of a slightly smaller cogeneration facility compared to what is currently proposed. However, the area of ground disturbed under this alternative would be approximately the same as what is currently proposed. Additionally, potential water quality and habitat impacts would be essentially the same when compared to the proposed project. Section 3.3 includes mitigation measures that would reduce project related impacts to biological resources to less than significant levels. Implementation of this alternative would have similar impacts to biological resources when compared to the proposed project.

Cultural Resources

This alternative would result in approximately the same level of ground disturbing activities as the proposed project. While there are no known cultural or historical resources on the project site that would be disturbed by construction activities, there is always the potential that a previously undiscovered resource could be discovered during construction activities. This alternative would disturb approximately the same area of land as the proposed project, and would, therefore, have a similar potential impact to cultural and historical resources as the proposed project.

Geology and Soils

This alternative would result in the construction of a slightly smaller cogeneration facility compared to what is currently proposed. However, the area of ground disturbed under this alternative would be approximately the same as what is currently proposed. Section 3.5 includes mitigation measures that would reduce project related impacts to geology and soils to less than significant levels. Implementation of this alternative would have similar impacts to geology and soils when compared to the proposed project.

Hazards and Hazardous Materials

This alternative would result in the construction of a slightly smaller cogeneration facility compared to what is currently proposed. Section 3.6 identified potentially significant impacts related to hazards associated with operation of the proposed project, and mitigation measures that reduce these hazards to a less than significant level. Given the relative similarities in the size of the cogeneration facility under this alternative and that which is currently proposed, there would be a comparable potential increased fire risk, increased risk of upset or spill of hazardous materials, and potential impacts to emergency evacuation plans. This alternative would have similar impacts related to hazards and hazardous materials compared to the proposed project.

Hydrology and Water Quality

This alternative would result in the construction of a slightly smaller cogeneration facility compared to what is currently proposed. This Alternative would result in a marginally lower increase in water use and groundwater pumping compared to the proposed project. Increased stormwater runoff volumes under this alternative would be essentially the same as those of the proposed project. The proposed project would require the use of up to 485 acre-feet per year of groundwater, and could potentially cause less than significant impacts to area wells through drawdown and interference. This alternative would have a reduced impact related to hydrology and water quality compared to the proposed project, since less water would be used for the smaller cogeneration facility.

Noise

As described in Section 3.8, the noise levels associated with the proposed plant will be approximately 3 dBA lower than the existing plant. This is due to the fact that the equipment is new and more efficient, the boiler and the turbine will be located within metal buildings, and the boiler will be fitted with a silencer on the steam vent. Under this alternative, the project would have similar noise impacts from operation of the cogeneration facility compared to what is currently proposed. However, potential traffic-related noise impacts from the proposed project would result in negligible increases in roadway noise associated with increased vehicle trips. This alternative would utilize fuel sources generated on site, and would eliminate the need to transport biomass materials to the project site from other locations. Therefore, traffic noise impacts would be reduced under this alternative when compared to the proposed project.

Public Services and Utilities

The proposed project would not result in any significant impacts to public services or utilities, however, in light of the smaller cogeneration facility under this alternative, there may be a minor decrease in the demand for fire services in the event of an emergency. Impacts related to increased water demand are addressed in the Hydrology and Water Quality section, and implementation of the proposed project would not result in any increased water demand from a municipal water supply, as all new water for the proposed project would come from on site wells. This alternative would have similar impacts to public services and utilities as the proposed project.

Transportation/Traffic

This alternative would not introduce additional fuel haul truck trips onto the study area intersections identified in Section 3.10, since all of the fuel burned in the cogeneration facility would come from on site sources. As described in Section 3.10, implementation of the proposed project would require intersection improvements to ensure less than significant impacts to intersections under cumulative conditions. The proposed project would result in increases in daily vehicle trips on area roadways and intersections generated by fuel haul trucks and employee vehicle trips. Under this alternative, the employee vehicle trips (12 per day) would be the same as the proposed project, but fuel haul trips (46 per day) would be

eliminated. Therefore, this alternative would have reduced traffic impacts when compared to the proposed project.

MAXIMUM AVAILABLE CONTROL TECHNOLOGY ALTERNATIVE

Aesthetics

This alternative would result in the construction and operation of the same size and design cogeneration facility in the same location as the proposed cogeneration facility. The visual changes to the project site under this alternative would be comparable to those of the proposed project. Under this alternative, exterior lighting would be identical as what is currently proposed. This alternative would have the same impact to aesthetics and visual resources as the proposed project.

Air Quality and Greenhouse Gasses

This alternative would result in the construction and operation of the same sized cogeneration power facility compared to what is currently proposed. Temporary construction-related air quality impacts from this alternative would be the same as the proposed project. Vehicle related air emissions would be identical to the proposed project. However, under this alternative, the cogeneration facility would incorporate MACT, which would result in fewer operational emissions than the proposed cogeneration facility as a result of the incorporation of more effective emissions control technology for NOx, CO, and SO2 than the BACT that is currently proposed. Overall, this alternative, and the associated reduction in emissions compared to the proposed project, would have a less severe impact on air quality and GHGs.

Biological Resources

This alternative would result in the construction of the same sized cogeneration facility compared to what is currently proposed. The area of ground disturbed under this alternative would be identical to what is currently proposed. Additionally, potential water quality and habitat impacts would be essentially the same when compared to the proposed project. Section 3.3 includes mitigation measures that would reduce project related impacts to biological resources to less than significant levels. Implementation of this alternative would have similar impacts to biological resources when compared to the proposed project.

Cultural Resources

This alternative would result in the same level of ground disturbing activities as the proposed project. While there are no known cultural or historical resources on the project site that would be disturbed by construction activities, there is always the potential that a previously undiscovered resource could be discovered during construction activities. This alternative would disturb the same area of land as the proposed project, and would, therefore, have a similar potential impact to cultural and historical resources as the proposed project.

Geology and Soils

This alternative would result in the construction of the same sized cogeneration facility compared to what is currently proposed. The area of ground disturbed under this alternative would be the same as what is currently proposed. Section 3.5 includes mitigation measures that would reduce project related impacts to geology and soils to less than significant levels. Implementation of this alternative would have similar impacts to geology and soils when compared to the proposed project.

Hazards and Hazardous Materials

This alternative would result in the construction of the same sized cogeneration facility compared to what is currently proposed. Section 3.6 identified potentially significant impacts related to hazards associated with operation of the proposed project, and mitigation measures that reduce these hazards to a less than significant level. Given the similarities in the size of the cogeneration facility under this alternative and that which is currently proposed, there would be a comparable potential increased fire risk, increased risk of upset or spill of hazardous materials, and potential impacts to emergency evacuation plans. This alternative would have similar impacts related to hazards and hazardous materials compared to the proposed project.

Hydrology and Water Quality

This alternative would result in the construction of the same sized cogeneration facility compared to what is currently proposed. This Alternative would result in the same increase in water use and groundwater pumping compared to the proposed project. Increased stormwater runoff volumes under this alternative would be the same as those of the proposed project. The proposed project and this alternative would each require the use of up to 485 acre-feet per year of groundwater, and could potentially cause less than significant impacts to area wells through drawdown and interference. This alternative would have similar impacts related to hydrology and water quality compared to the proposed project.

Noise

As described in Section 3.8, the noise levels associated with the proposed plant will be approximately 3 dBA lower than the existing plant. This is due to the fact that the equipment is new and more efficient, the boiler and the turbine will be located within metal buildings, and the boiler will be fitted with a silencer on the steam vent. Under this alternative, the project would have the same noise impacts from operation of the cogeneration facility compared to what is currently proposed. Traffic related noise impacts would also be the same as the proposed project, as there would be no change in vehicle trips under this alternative, compared to the proposed project. Noise impacts would be the same as the proposed project under this alternative.

Public Services and Utilities

The proposed project would not result in any significant impacts to public services or utilities. Impacts related to increased water demand are addressed in the Hydrology and Water Quality

section, and implementation of the proposed project would not result in any increased water demand from a municipal water supply, as all new water for the proposed project would come from on site wells. This alternative would have similar impacts to public services and utilities as the proposed project.

Transportation/Traffic

This alternative would require the same level of employee vehicle trips and fuel haul truck trips as the proposed project. Impacts to traffic and circulation would be the same under this alternative when compared to the proposed project.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires that an environmentally superior alternative be identified among the alternatives that are analyzed in the EIR. If the No Project Alternative is the environmentally superior alternative, an EIR must also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6(e)(2)). The environmentally superior alternative is that alternative with the least adverse environmental impacts when compared to the proposed project.

As Table 5.0-1 presents a comparison of the alternative project impacts with those of the proposed project.

TABLE 5.0-1: COMPARISON OF ALTERNATIVE PROJECT IMPACTS TO THE PROPOSED PROJECT

ENVIRONMENTAL ISSUE	*NO PROJECT ALTERNATIVE*	*REDUCED SIZE/ON SITE MATERIALS ALTERNATIVE*	*MACT ALTERNATIVE*
	RELATIVE CHANGE IN IMPACT		
Aesthetics	Lesser	NC	NC
Air Quality and Greenhouse Gasses	Lesser	+/-	Lesser
Biological Resources	Lesser	NC	NC
Cultural Resources	Lesser	NC	NC
Geology and Soils	Lesser	NC	NC
Hazards and Hazardous Materials	Lesser	NC	NC
Hydrology and Water Quality	Lesser	Lesser	NC
Noise	Greater	Lesser	NC
Public Services and Utilities	Lesser	NC	NC
Transportation and Circulation	Lesser	Lesser	NC

+/- = GREATER IMPACT WITH REGARD TO SOME ASPECTS OF IMPACT AND DECREASED IMPACTS IN OTHER ASPECTS
NC = NO SUBSTANTIAL CHANGE IN IMPACT FROM THAT OF THE PROPOSED PROJECT

As shown in the table above, the No Project Alternative is the environmentally superior alternative. However, as required by CEQA, when the No Project Alternative is the environmentally superior alternative, the environmentally superior alternative among the others must be identified. Therefore, the Reduced Cogeneration Facility Site/On Site Materials Only Alternative is the next environmentally superior alternative to the proposed project.

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