2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or miligation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Miligation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 202 - PLANTING TREES FOR AESTHETIC VISUAL BEAUTY.

The Document appears to have ignored this potentially feasible Miligation. Please carefully analyze and disclose the potential benefits of Planting Trees for Aesthetic Visual Beauty.

-

* 203 - LOSS OF COOLING SHADE FROM TREES.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Loss of Cooling Shade from Trees.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Trees cool large amounts of surface level air and land (especially black asphalt) by providing shade and by evaporation. In sunny areas workers often prefer tree shaded parking spaces.

Please these criteria to measure this impact: temperature, volume of air cooled, mapped area of impact, duration of impacts.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Loss of Cooling Shade from Trees.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

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18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 204 - PLANTING TREES FOR OUTDOOR COOLING SHADE.

The Document appears to have ignored this potentially feasible Mitigation. Please carefully analyze and disclose the potential benefits of Planting Trees for Outdoor Cooling Shade.

Trees cool large amounts of surface level air and land (especially black asphalt) by providing shade and by evaporation. In sunny areas workers often prefer tree shaded parking spaces.

* 205 - INTELLECTUAL INSULT OF MAN-MADE DEVELOPMENT.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Intellectual Insult of Man-made Development.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The Intellectual Insult of non-natural man-made development or extraction activities in a Wild Area is real. Some people value wilderness and other phenomena as priceless.

How much money must I offer so you will sell your child or your mother? Consider the outrage if someone offered money to avoid democracy, justice or religion.

"Large aspects of human values are strictly emotional. They can scarcely be measured in material terms, nor can a monetary value be assigned to them. Even money, itself, often acquires an emotional value that may not be very closely related to its
intrinsic value."

"Such value judgments may not be lightly dismised as is shown by the fact that most of the values for which men will face death - such as love, patriotism, or honor - or for which they will face economic loss - such as friendship, dignity, sentiment, or,
above all, beauty - cannot be measured in money."
Encyclopedia of Biological Sciences, P. Gray, McGraw-Hill 1961, p 271

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Intellectual Insult of Man-made Development.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 206 - AIR POLLUTION GENERAL.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Air Pollution General.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Sins of Emission

"U.S. Industries pump at least 2.4 Billion pounds of chemicals into the air every year." Audubon 1994 Environmental Almanac citing US-EPA

Air Pollution has been measured traveling at least 7,000 miles from Manchuria, China to Crater Lake, Oregon and caused significant degradation of air quality at that distance. Science News, Dec 12, 1998

School Absenteeism Rises When Air Pollution Rises -Effects of ambient air pollution on School Absenteeism Due to Respiratory Illnesses, Report sponsored in part by US-APE & CARB. www.epidemology.com

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution General.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 207 - INDOOR AIR POLLUTION.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Indoor Air Pollution.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Indoor Air Pollution includes lead, radon, secondhand tobacco smoke, cleaning chemicals (e.g. ammonia and chlorine), pesticides, ozone from photocopiers and laser printers, photography chemicals, hobby chemicals, insulation outgassing, building material
outgassing; furniture, drapes and rug outgassing; heating appliances (exhaust from space heating, water heating and cooking appliances. Wood stoves, kerosene heaters, coal heaters and natural gas water and space heaters are of special concern).

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Indoor Air Pollution.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 208 - VAPOR INTRUSION.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Vapor Intrusion.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Vapor Intrusion occurs when volatile compounds, typically liquids such as TCE (trichlorethylene and chlorinated hydrocarbons, ascend through soil and building foundations and create indoor air pollution.

In Denver, chlorinated organic solvents from dry-cleaning and degreasing operations are cancer causing and a common example of this problem. Scientific American July 2002

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Vapor Intrusion.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this Impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 209 - VEHICLE AIR POLLUTION.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Vehicle Air Pollution.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This Impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Vehicle Air Pollution.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

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37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this Impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 210 - AIR POLLUTION-NITROGEN OXIDES (NOX) BY CONCENTRATION.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential Impacts of Air Pollution-Nitrogen Oxides (NOx) by Concentration.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The concentration of an air pollutant is independent of its weight and more important to safe breathing. No one has ever drowned by being surrounded by a cloud (which can have a mass of millions of pounds), but people often drown in just a few inches or
ounces of water (concentrated cloud).

"It has been shown that prolonged exposure to NOx, greater than 0.5 ppm appears to be particularly hazardous for person with asthma, chronic respiratory diseases, and cardiac disease. People living in the Los Angeles area are often exposed for long
periods of time to NOx concentrations above what is considered safe." Dictionary of Scientific Literacy, Brennan, 1992, Wiley.

A report done in 1990 for the US-EPA by Tom Addison found: "Analyzing the effects of only one pollutant often was justified by the inaccurate conclusion that CO serves as an 'indicator of the full range of pollutants'. The effects of a project on the full range of air pollutants, however, can NOT be estimated by CO emissions. In general, increasing the average travel speed on a freeway from a congested, stop-and-go condition to a steady flow decreases the emissions of both CO and total HC
(hydrocarbons), but INCREASES the emissions of NO (oxides of nitrogen). Furthermore, the impacts of CO are localized, but the formation of ozone from HC and NO affects the larger air basin".

"Nitrogen Dioxide's odor threshold is between 1 and 3 ppm; nose and throat irritation has been associated with 13 ppm. At concentrations of 25 ppm volunteers complained of pulmonary discomfort after five minutes of exposure."

What are the significance levels used for breathing concentrations versus time for NOx (as distinguished from weight)?

Labware Direct (1 800 356 0783) sells Nitrogen Dioxide detection system measuring concentrations as as low as 0.5 ppm.

Davis Instruments sells a Nitrogen Dioxide monitor for $517 which measures down to 0.1 ppm. (800 269 0299)

QUANTIFICATION OF BASELINES AND IMPACTS:

This Impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Nitrogen Oxides (NOx) by Concentration.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Miligation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 211 - AIR POLLUTION-NITROGEN OXIDES (NOX) BY WEIGHT.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Nitrogen Oxides (NOx) by Weight.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The San Luis Obisbo Air Pollution Control District states that any activity creating 10 lbs of Nitrogen Oxides (NOx) or more per day is a potentially significant impact; and any activity creating more than 137 lbs / day of NOx requires an EIR in all cases.

MBAPCD Significance Level for Nitrogen Oxides (NOx) is the same at 137 lbs / day.

QUANTIFICATION OF BASELINES AND IMPACTS:

This Impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Nitrogen Oxides (NOx) by Weight.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other Impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this Impact affects.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 212 - AIR POLLUTION-SULFUR DIOXIDE (SO2) BY CONCENTRATION.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential Impacts of Air Pollution-Sulfur Dioxide (SO2) by Concentration.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The concentration of an air pollutant is independent of its weight and more important to safe breathing. No one has ever drowned by being surrounded by a cloud (which can have a mass of millions of pounds), but people often drown in just a few inches or
ounces of water (concentrated cloud).

Increased mortality from bronchitis and lung cancer has been observed with an annual mean Sulfur dioxide concentration of 0.04 part per million. (Environmental Protection, Emil Chanlett 1979) The London Smog of Dec 1952 killed some 4000 people at a
measured SO2 concentration of 1.34 ppm. "Atmospheric Pollution", Wilfrid Bach, McGraw-Hill 1972 p 45

Many air pollution disasters have involved SO2: London 1952 (4000 human deaths); London 1956 (1000 dead); London 1957 (700-800 dead); London 1962 (700 dead); London 1880 (1000 dead); New York 1953 (250 dead); New York 1963 (200-400 dead); Meuse Valley
Belgium 1930 (63 dead); Donora Pennsylvania 1948 (20 dead).

"In contact with water it is converted into sulfurous acid (H2SO3) and ultimately sulfuric acid (H2SO4). This acid corrodes machinery and metal components and damages stone buildings (and marble statues), the Acropolis being a good example. Even more
seriously it engenders respiratory and lung diseases in millions of people. For many years people refused to accept that this problem extended beyond industrial centers themselves. But acids can be carried great distances on the wind, ... from USA to
Canada, before falling as acid rain. Forest growth is disrupted and the debilitated trees become prone to disease and parasitic attack. Today the forests of central Europe are beginning to die as the alkaline reserves in the bedrock become exhausted. In
lakes and waterways all life ceases when the pH value falls below about 4. Many lakes in Scandanavia are already devoid of all organic life." Earth Book Atlas 1987, pg 24 ISBN 0-87746-100-7

"Sulfur dioxide in the air at concentrations of 1 part per million can kill the cells in leaves." Yearbook of Agriculture 1957

The states of Virgina and Maryland set maximum concentration levels for one (1) hour at 0.1 ppm for Sulfur oxides.

The state of Hawaii set maximum concentration levels for annual exposure to Sulfur oxides at 0.007 ppm.

What are the significance levels used for breathing concentrations versus time for SO2?

Labware Direct (1 800 356 0783) sells Sulfur Dioxide detection system measuring concentrations as as low as 0.05 ppm.

Davis Instruments sells a Sulphur Dioxide monitor for $517 which measures down to 0.1 ppm. (800 269 0299)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Sulfur Dioxide (SO2) by Concentration.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 213 - AIR POLLUTION-SULFUR DIOXIDE (SO2) BY WEIGHT.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Sulfur Dioxide (SO2) by Weight.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Increased mortality from bronchitis and lung cancer has been observed with an annual mean Sulfur dioxide concentration of 0.04 part per million. (Environmental Protection, Emil Chanlett 1979) The London Smog of Dec 1952 killed some 4000 people at a
measured SO2 concentration of 1.34 ppm. "Atmospheric Pollution", Wilfrid Bach, McGraw-Hill 1972 p 45

Many air pollution disasters have involved SO2: London 1952 (4000 human deaths); London 1956 (1000 dead); London 1957 (700-800 dead); London 1962 (700 dead); London 1880 (1000 dead); New York 1953 (250 dead); New York 1963 (200-400 dead); Meuse Valley
Belgium 1930 (63 dead); Donora Pennsylvania 1948 (20 dead).

"In contact with water it is converted into sulfurous acid (H2SO3) and ultimately sulfuric acid (H2SO4). This acid corrodes machinery and metal components and damages stone buildings (and marble statues), the Acropolis being a good example. Even more
seriously it engenders respiratory and lung diseases in millions of people. For many years people refused to accept that this problem extended beyond industrial centers themselves. But acids can be carried great distances on the wind, ... from USA to
Canada, before falling as acid rain. Forest growth is disrupted and the debilitated trees become prone to disease and parasitic attack. Today the forests of central Europe are beginning to die as the alkaline reserves in the bedrock become exhausted. In
lakes and waterways all life ceases when the pH value falls below about 4. Many lakes in Scandanavia are already devoid of all organic life." Earth Book Atlas 1987, pg 24 ISBN 0-87746-100-7

The San Luis Obisbo Air Pollution Control District states that any activity creating 10 lbs of Sulfur Dioxide or more per day is a potentially significant impact; and any activity creating more than 137 lbs / day of SO2 requires an EIR in all cases.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

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35. Please list, describe and quantify all Indirect impacts related to this one.

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37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 214 - AIR POLLUTION-SULFUR DIOXIDE (SO2) COMBINED WITH PARTICULATES.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Sulfur Dioxide (SO2) Combined with Particulates.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Combinations of two or more gas-aerosol mixtures in moist and cold weather can caused synergistic (highly enhanced) damage to health." This refers to a discussion of air pollution disasters including the loss of 400 lives in London in Dec 1952.

"Animal test suggest that when particulate matter and SO2 concentrations, normally considered to be harmless, existed together as a gas-aerosol combinations, they produced purple hemorrage and paralysis of respiratory tracts. If, additionally, these
gas-aerosol mixtures occurred in a super cool state such as was the case in the 1952 [London] fog, they showed on reaching the lungs, a higher toxicity than hydrocyanic acid(HCN)." "Atmospheric Pollution", Wilfrid Bach, McGraw-Hill 1972 p 50

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Sulfur Dioxide (SO2) Combined with Particulates.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 215 - AIR POLLUTION-SULFATE (SO4).

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Sulfate (SO4).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

In the Northeast US SO4 comprises about 60% of the pm 2.5. PM 2.5 typically remains in the air for 5 days. In the West, there is more dust and sulfate is less (but still) important.

There is a CAA standard for SO2 but not SO4 (sulfate).

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Sulfate (SO4).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this Impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other Impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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46. Please provide the reverse of this impact as Mitigation.

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* 216 - ACID PRECIPITATION "ACID RAIN".

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Acid Precipitation "Acid Rain".

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

ANY INCREASE FROM FULL USE IS A SIGNIFICANT ENVIRONMENTAL IMPACT When a resource is fully used, or at capacity, any increase in demand is a potentially significant environmental impact under California's Environmental Quality Act (CEQA). It is also a potentially significant cumulative environmental impact.

"Once the 'cumulative loading' of acids deposited in these areas through the years has exhausted the environment's limited neutralizing capacity, severe effects follow very quickly with the addition of small, previously inconsequential quantities of
acid." G. Whelstone, Environmental Law Reporter, 10, 1982

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Acid Precipitation "Acid Rain".

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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15. Please provide a graph of HISTORICAL measurements.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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values.

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47. Please provide an ALTERNATIVE which avoids this impact.

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* 217 - ACID RAIN HARMING FORESTS.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Acid Rain Harming Forests.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Acid rain includes all forms of precipitation - rain, snow and fog. It is caused in large part by coal-fired electric plants.

"Highly acidic rain, pH 3.0 and lower, does damamge some crops. Acid rain also damages trees." -Dictionary of Scientific Literacy, Wiley, 1992

"Rainwater is normally slightly acidic... however Adirondack lakes were at least one hundred times more acidic than expected." Adirondack Mountains are downwind of some major coal-fired power plants. Environmental Science, M,M & W p 9

"Death rates in trees in midwestern US forests showed a dramatic rise during the 1980s. This and similar problems in European forests, appears to be due to interactions of air pollution effects (acid rain and excess deposition of nitrogen are altering
soil chemistry and water quality, and high ozone concentrations at ground level are damaging foliage) with natural stresses, such as insect attacks, diseases, and drought." Betrayal of SR, p 151

Leaching of the critical nutrient calcium from forest soils in the eastern US is occuring at an unsustainable rate. Long-Term Depletion of Calcium and other nutrients in Eastern US Forests, Environmental Management, Federer, et all 13:593-601

That loss, which appears to be caused by a combination of short-rotation harvesting of the forests and acid precipitation, could result in a roughly 50 percent drop in both calcium and forest biomass in about 120 years. "The effects of leaching and
whole-tree harvesting on cation budgets of several forests", Johnsen et all, Journal of Environmental Quality 17: 418-424

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Acid Rain Harming Forests.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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16. Please quantify the length of time this impact would last.

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18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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20b. If no margin of error is used please state that clearly.

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46. Please provide the reverse of this impact as Mitigation.

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" 218 - LIMING LAKES.

Adding lime to lakes is sometimes suggested as a way to reduce the impacts of acid rain.

"Let us dismiss out of hand that we can lime the northeast quadrant of a continent... If you take an acid lake and lime it, you do not now have anormal lake; you now have a limed, formerly very acid lake, with a very peculiar water chemistry and a very
peculiar biota as a result." Harold Harvery, on the use of lime to counteract the effects of acid rain, Adirondack Life, Sept-Oct 1982

"I would suggest it is a good way to manage a fish hatchery but a lousy way to manage an environment." Hans Martin, Director Air Resources Branch, Environment Canada, on the use of lime in lakes to counteract acid rain, speech, SOil Conservtion Society
of America conference, Burlington, Vt., 25 Oct, 1982

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE: Liming Lakes.

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure: Liming Lakes. using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure: Liming Lakes. using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Liming Lakes.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the miligation measure has been operating, where in the process the mitigation is now, and what
percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative
or experimental the proposed mitigation measure: Liming Lakes.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental
the proposed mitigation measure: Liming Lakes.

NEW LEVEL IF SUCCESSFUL E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSIs and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

S

* 219 - SCRUBBERS FOR VEHICLE SO2 EMISSIONS.

The Document appears to have ignored this potentially feasible Mitigation. Please carefully analyze and disclose the potential benefits of Scrubbers for Vehicle SO2 Emissions.

Scrubbers use a slurry of water and ground limestone to combine with the sulfur.

"Up to 90 percent of sulfur dioxide in flue gases can be removed with this technology." There is no reason to expect this could not provide significant reductions in vehicle emissions.

* 220 - AIR POLLUTION-CARBON MONOXIDE (CO) BY CONCENTRATION.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Carbon Monoxide (CO) by Concentration.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The concentration of an air pollutant is independent of its weight and more important to safe breathing.

No one has ever drowned by being surrounded by a cloud (which can have a mass of millions of pounds), but people often drown in just a few inches or ounces or ounces of water (concentrated cloud).

Carbon Monoxide from auto exhausts is a popular method of suicide.

"The usual levels of 30 ppm CO found in city air bind about 5 percent of the hemoglobin, which in terms of oxygen supply of the blood is comparable to living at an altitude of 6,000 feet." "Atmospheric Pollution", Wilfrid Bach, McGraw-Hill 1972 p 56

Adverse Human Health Guidelines "12-17 mg/cubic meter for 8 hours produces a concentration of 2-2.5% carboxyhemoglobin. 35 mg/cubic meter for 8 hours produces a concentration of 5% carboxyhemoglobin." Id.

There is no lower limit to measuring CO concentrations.

What are the significance levels used for breathing concentrations versus time for CO?

Labware Direct (800 356 0783) sells Carbon Monoxide detection system measuring concentrations as as low as 5 ppm.

Davis Instruments sells several CO monitors from $265 to $299 which measure down to 0.0 ppm. (800 269 0299)

KiddeSafety sells a continuous readout CO detector for $40.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Carbon Monoxide (CO) by Concentration.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

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33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

" 221 - AIR POLLUTION-CARBON MONOXIDE (CO) BY WEIGHT.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Carbon Monoxide (CO) by Weight.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Carbon Monoxide from auto exhausts is a popular choice for suicide as it is so lethal.

"Of the world's total CO production of 232 million tons, 80 percent is produced by automobiles." "Atmospheric Pollution", Wilfrid Bach, McGraw-Hill 1972 p 56

"The usual levels of 30 ppm CO found in city air bind about 5 percent of the hemoglobin, which in terms of oxygen supply of the blood is comparable to living at an altitude of 6,000 feet." Ibid, p 56

"CO is a very stable gas. In an experiment a CO-O mixture under exposure to sunlight remained unchanged even after seven years." Ibid, p 10

There is no lower limit to detecting CO concentrations when using nondispersive infrared spectrometry. Ibid p 138

The San Luis Obisbo Air Pollution Control District states that any activity creating more than 50 lbs / day of Carbon Monoxide is a potentially significant impact; and any activity creating more than 550 lbs / day of Carbon Monoxide requires an EIR in
all cases.

The MBAPCD Significance Level for Carbon Monoxide (CO) is 550 lbs / day.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Carbon Monoxide (CO) by Weight.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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27. Please state whether the MARGIN of ERROR is measured or assumed.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth Impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this Impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 222 - AIR POLLUTION-CARBON DIOXIDE (CO2).

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Carbon Dioxide (CO2).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"CO2, released into the air remains there for at least several centuries." "Atmospheric Pollution", Wilfrid Bach, McGraw-Hill 1972 citing C.D. Keeling, "The Concentration and Isotopic Abundances of CO2 in the Atmosphere," Tellus 12, 200-203, 1960

What thresholds do you use as significant in both weight and concentration?

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Carbon Dioxide (CO2).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 223 - AIR POLLUTION-HYDROCARBONS (HC).

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Hydrocarbons (HC).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Common sources of HC air pollution are Vehicles, Burning and decomposition. Vehicle HC air pollution turns into SMOG. Oil from paving releases continuous long term HC air pollution. (See also Asphalt-Water Pollution)

A concentration of HC at 100 micrograms / cubic meter can produce injury. Email Chanlett, Environmental Protection, 1979, citing NAAQS 1971

A concentration of HC of 160 micrograms / cubic meter is the maximum level that my occur 6-9 am once each year. Id.

Labware Direct (1 800 356 0783) sells Diesel exhaust detection system measuring concentrations of "High Class" hydrocarbons as low as 100 ppm; "Low Class" hydrocarbons as low as 0.05%; and petroleum distillates as low as 0.5 mg/Liter.

Davis Instruments sells a combustible gas detector for ammonia, methane, natural gas, propane, butane, isobutane, cyclopentane, ethane, ethanol, CO monitors for $230 which measures down to 5 ppm. (800 269 0299)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Hydrocarbons (HC).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other Impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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33. Please list, describe and quantify all Construction impacts related to this one.

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35. Please list, describe and quantify all Indirect impacts related to this one.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Miligation.

47. Please provide an ALTERNATIVE which avoids this impact.

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* 224 - AIR POLLUTION-REACTIVE ORGANIC GASES (ROGS OR VOCS) BY CONCENTRATION.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Reactive Organic Gases (ROGs or VOCs) by Concentration.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The concentration of an air pollutant is independent of its weight and more important to safe breathing. No one has ever drowned by being surrounded by a cloud (which can have a mass of millions of pounds), but people often drown in just a few inches or
ounces of water (concentrated cloud).

Reactive Organic Gases (ROGs) include: unsaturated olefins and compounds belonging to the aromatic or benzene group.

"The aromatics have been found to be carcinogenic or cancer-producing." "Atmospheric Pollution", Wilfrid Bach, McGraw-Hill 1972 p 10

Pesticides used in California fields can cause smog in agricultural regions of the state, according to a report released recently by the Environmental Working Group and Californians for Pesticide Reform. After application, pesticides give off large
quantities of reactive organic gases (ROGs), also known as volatile organic compounds (VOCs), which contribute to formation of smog and which can also cause cancer, birth defects, nerve damage and kidney and heart disease. Approximately 98.9 million
pounds of ROGs are emitted from pesticides each year in California – nearly four times the total ROG emissions from petroleum refining, and more than double the ROG emissions from all other industrial sources.

ROGs (or VOCs) are often measured in units of pounds per square inch Reid Vapor pressure.

Gasoline containing ethanol is limited to 0.2 psi (Reid).

What are the significance levels used for breathing concentrations versus time for ROGs?

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Reactive Organic Gases (ROGs or VOCs) by Concentration.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
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37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 225 - AIR POLLUTION-REACTIVE ORGANIC GASES (ROGS OR VOCS) BY WEIGHT.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Reactive Organic Gases (ROGs or VOCs) by Weight.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Pesticides used in California fields can cause smog in agricultural regions of the state, according to a report released recently by the Environmental Working Group and Californians for Pesticide Reform. After application, pesticides give off large
quantities of reactive organic gases (ROGs), also known as volatile organic compounds) which contribute to formation of smog and which can also cause cancer, birth defects, nerve damage and kidney and heart disease. Approximately 98.9 million pounds of
ROGs are emitted from pesticides each year in California – nearly four times the total ROG emissions from petroleum refining, and more than double the ROG emissions from all other industrial sources.

The San Luis Obisbo Air Pollution Control District states that any activity creating 10 lbs of Reactive Organic Gases (ROGs) or more per day is a potentially is a potentially significant impact; and any activity creating more than 137 lbs / day of ROGs
requires an EIR in all cases.

ROGs (or VOCs) are often measured in units of pounds per square inch Reid Vapor pressure.

The MBAPCD CEQA Significance Level for Reactive Organic Gases (ROGs) is 137 lbs / day.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Reactive Organic Gases (ROGs or VOCs) by Weight.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 226 - AIR POLLUTION-RADON-222.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Radon-222.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Radon is the decay product of Radium 226. Radon-222 is the decay product of uranium 238. Radon decays into radioactive elements which emit alpha particles, which in a respiratory system can lead to lung cancer. Radon-222 quickly deacys into solid
particles that when inhaled expose lung tissue to a large amount of ionizing radiation.

Ionizing radiation damages biological damage because it has enough energy to knock an electron out of its orbit. A powerful blast of radiation can cause cancer by damaging a cell's repair mechanism.

The EPA's indoor radom survey suggests that annual radon levels above 4 picocuries (4 trillion's of a curie) is unsafe. Canada, Sewden and Norway have set 20 picocuries as the maximum safe level. Living in The Environment by G. Tyler Miller pg 477,
Wadsworth Publishing 1998

A California state report released April 22 1999 concluded about five (5) percent of California's elementary schools have significant concentrations of cancer-causing radon. It sampled 378 of the state's 5400 elementary schools.

QUANTIFICATION OF BASELINES AND IMPACTS:

This Impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Radon-222.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repealable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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47. Please provide an ALTERNATIVE which avoids this impact.

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* 227 - AIR POLLUTION-FORMALDEHYDE.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Formaldehyde.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Formaldehyde is a respiratory irritant and a known carcinogen on the California Proposition 65 list.

CARB's recommended exposure limit is 0.5 parts per million.

Battelle Memorial Institute in Columbus Ohio, measured 24-hour Formaldehyde emissions from 55 domestic consumer and construction products. Many consumer product release copious amounts including Latex paints, insulating foams, acid-cured floor finishes
(up to 1.2 grams per square meter per hour), particleboard, and pre-pasted wall-paper (nearly 700 micrograms per square meter per hour). Science News Jan 9 1999, pg 22

Labware Direct (1 800 356 0783) sells Formaldehyde detection systems measuring concentrations as low as 1 ppm.

QUANTIFICATION OF BASELINES AND IMPACTS:

This Impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Formaldehyde.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 228 - AIR POLLUTION-LEAD (PB).

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Lead (Pb).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

According to the Agency for Toxic Substances and Disease Registry neurological studies do not indicate any safe level of lead exposure.

Lead is a known carcinogen on the California Proposition 65 list.

Lead is a known reproductive toxic on the California Proposition 65 list.

Lead is a known male reproductive toxic on the California Proposition 65 list.

Lead Air Pollution has been measured traveling at least 7,000 miles from Manchuria, China to Crater Lake, Oregon exceeding 10 times its typical values. Science News, Dec 12, 1998

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Lead (Pb).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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* 229 - AIR POLLUTION-ARSENIC.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Arsenic.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Arsenic Air Pollution has been measured traveling at least 7,000 miles from Manchuria, China to Crater Lake, Oregon exceeding 10 times its typical values. Science News, Dec 12, 1998

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Arsenic.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 230 - AIR POLLUTION-MERCURY (HG).

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Mercury (Hg).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Mercury is known to the state of California as causing reproductive toxicity on the California Proposition 65 list.

US-EPA reported some 341 tons of mercury are spewed into the air annually, mostly by power plants and incinerators. Science News Vol 145: 119 "Even lightbulbs, paint and dental fillings contribute substantially."

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Mercury (Hg).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this Impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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values.

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37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 231 - AIR POLLUTION-CADMIUM (CD).

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Cadmium (Cd).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Human activity has ... multiplied the natural flow of cadmium into the atmosphere eightfold..." Beytrayal or Science and Reason, Erlich, 1996

Cadmium is a known carcinogen on the California Proposition 65 list. Cadmium is a known reproductive toxic on the California Proposition 65 list.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Cadmium (Cd).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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* 232 - AIR POLLUTION-CHROMIUM.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Chromium.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Chromium is a known carcinogen that causes tumors of lungs and nasal passages when inhaled.

"Chromium, in its 'hexavalent' state, is one of the most potent substances proven to cause cancer in humans." -LA's Lethal Air, Eric Mann, 1991

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Chromium.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 233 - AIR POLLUTION-BERYLLIUM.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Beryllium.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Beryllium disease is an incurable lung illness.

Beryllium is a metal critical to the US Military. It is used in missles jet planes and weapons. A federal safety limit exists.

Nearly 150 Dept of Energy and contractor employees exposed to radioactive substances have been disgnosed with Chronic Beryllium Disease.

DOE estimates between 250 and 700 DOE contractors will develop radiation induced cancers over the next 30 years, of which 60 percent may die. (US-DOE Office of Env Health & Safety, 1999)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Beryllium.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 234 - AIR POLLUTION-COPPER.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Copper.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Copper Air Pollution has been measured traveling at least 7,000 miles from Manchuria, China to Crater Lake, Oregon exceeding 10 times its typical values. Science News, Dec 12, 1998

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Copper.

1b. If no objective criteria are used please state that clearly.

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3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 235 - AIR POLLUTION-OZONE FROM VEHICLES (O3) CONCENTRATIONS.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Ozone from Vehicles (O3) Concentrations.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Ozone induces nausea, headaches and lung infections at 0.5 parts per million. Ozone is lethal at 50 ppm after 30 minutes. The current U.S. Ozone limit is 0.08 ppm averaged over eight hours and 0.12 ppm for one hour. At 0.07 ppm of ozone "even robust
Individuals may suffer temporary, subtle damage - leaky lungs." Science News May 13, 2000

This means that lung damage can occur when ozone levels are below U.S. legal limits.

"Each year, smog prematurely kills more than 1,600 people in the South Coast basin (Los Angeles), according to air quality officials" -L.A.'s Lethal Air, Eric Mann, 1991

The Pinnacles monitoring station in Monterey County recorded numerous violations of the state ozone standard from 1992-1997.

According to Ellis B. Cowlings of North Carolina State University US crop yields are reduced by $5 billion to $10 billion annually by ozone pollution. Science News March 27, 1999

Labware Direct (1 800 356 0783) sells Ozone detection system measuring concentrations as low as 0.025 ppm.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Ozone from Vehicles (O3) Concentrations.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

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* 236 - AIR POLLUTION-SMOG FROM VEHICLE CONCENTRATIONS.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Air Pollution-SMOG from Vehicle Concentrations.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

SMOG is caused by pollutants including ground level ozone, vehicle HC and can be caused by pesticides used in California fields.

"Each year, smog prematurely kills more than 1,600 people in the South Coast basin (Los Angeles), according to air quality officials" -L.A.'s Lethal Air, Eric Mann, 1991

The Pinnacles monitoring station in Monterey County recorded numerous violations of the state ozone standard from 1992-1997.

Labware Direct (1 800 356 0783) sells Ozone detection system measuring concentrations as low as 0.025 ppm.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-SMOG from Vehicle, Concentrations.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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values.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 237 - AIR POLLUTION-OZONE ON AGRICULTURAL PRODUCTION.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Air Pollution-OZONE on Agricultural Production.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The California Air Resources Board Crop Loss Air Pollutant Assessment Program report has provided information to guide efforts to design crop-effects studies, to perform economic analyses of yield loss, and to prepare reports for other local, State, and Federal agencies on the effects of air pollution on the public welfare. It found -

"In 1993, ozone-caused yield losses of 20-30% were estimated for cantaloupes, grapes, and cotton, which are known to be ozone-sensitive crops. Moderate losses (10-15%) were projected for dry beans, oranges, alfalfa, onions, and lemons. Minor losses (1-7%) were expected for ozone-tolerant crops such as tomato, wheat, rice, corn, and lettuce. GIS-based techniques were used to refine county-averaged estimates of yield loss in selected agricultural production areas. By plotting effects to acreages of irrigated farmlands only, differences in crop loss within a county could be accurately displayed. For example, cotton yield losses were 5-10% greater in the eastern portions of Fresno, Kings, and Tulare counties than in the western portions."

California Air Resources Board Research Notes: # 89-6 Crop Losses from Air Pollution in California California Air Resources Board found -

"This research assessed the statewide effect of ambient ozone on the yield of important agricultural crops. Ozone dose-yield loss equations, ozone monitoring data, and county crop production data were used to estimate yield losses for each county and for the state as a whole. The study concludes that at current air quality levels, a number of important crops are suffering substantial yield losses. Based on these conclusions, an economic modeling study estimated that improving air quality could result in economic benefits of up to $333 million to California growers and consumers."

The results of the Program in Crop Loss Assessment indicate that: 1) Ambient ozone is causing substantial yield losses in important California crops; 2) Substantial reductions in these losses could be realized by attainment of the State ambient air quality standard for ozone; and 3) Attaining the State standard for ozone may not be adequate to protect crops.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-OZONE on Agricultural Production.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

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47. Please provide an ALTERNATIVE which avoids this impact.

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* 238 - AIR POLLUTION-RADIOACTIVE MATTER.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Radioactive Matter.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

There are two major types of radioactive air pollution - constant low level and intermittent high level. A low level (relatively) continuous example is the radioactivity released from burning wood in woodstoves.

"Radioactivity is neither spatially or temporally uniform, natural radioactivity is neither physiologically nor biologically safe, any amount of increased radiation, no matter how small, will increase the number of persons affected by genetic disease."
A.M.O.Veale, "Biological Effects of Fallout," New Zealand Science Review, 24(4), 49-50, 1966 cited by "Atmospheric Pollution", Willrid Bach, McGraw-Hill 1972 p 86

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Radioactive Matter.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 239 - AIR POLLUTION-RADIOACTIVE "SPILLS".

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Radioactive "Spills".

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

There are two major types of radioactive air pollution - constant low level and less frequent high level "spills." Three-Mile Island released 10 million curies of radioactivity into the atmosphere at about 4am on March 28 1979. (Union of Concerned
Scientists, Nucleus, Summer 1999

"Reactor accidents are extremely serious." "Atmospheric Pollution", Wilfrid Bach, McGraw-Hill 1972 p 91

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Radioactive "Spills".

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 240 - AIR POLLUTION-PESTICIDES.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Pesticides.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

AMBIENT AIR PESTICIDES "FRESNO, California, February 20, 2001 (ENS) - Independent scientific monitoring by the Environmental Working Group (EWG) has found high concentrations of a partially banned pesticide in the air some California residents breathe."

"One-third of ambient air monitoring samples from the San Joaquin Valley detected the pesticide chlorpyrifos, which the federal government has banned for home use as unsafe for children. Chlorpyrifos remains the most widely used agricultural insecticide
in California." Ibid.

"Monterey County ranks third in California for the number of pesticide poisonings in a year" according to the California Department of Pesticide Regulation in Sacramento in 1997.

Some 428 cases of pesticide poisoning were reported to public officials in Monterey County during a six year period. 50 cases of pesticide poisoning were reported in Monterey County in 1996.

Monterey county uses at least 10 million pounds of pesticides every year. (10 million pounds only includes the disclosed active ingredients.)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Pesticides.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 241 - PESTICIDE DRIFT.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Pesticide Drift.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Pesticide drift is that portion of the applied pesticide spray cloud which affects any biota outside the target area. All pesticides "drift" from their point of application. This drift can contaminate air, soils and water hundreds, and even thousands, of miles from where it was applied.

Talk to anyone who has experienced drift, however, and a complex picture emerges: a poisoned person who spends years trying to regain health; a pet injured or infertile; contaminated homes or property that must be abandoned; loss of a year's livelihood when contaminated crops can't be sold.

DRIFT HOW FAR? Pesticides have caused damage 50 miles from their application site, traceable detection has occured at 7,000 miles.

Pesticide drift has caused crop damage 50 miles from its application. "In central Washington, 2,4-D applied to wheat fields drifted 10 to 50 miles and damaged vineyards." Air Pollution Control Association Journal 28:1015-1020, Robinson, E. and L.L. Fox 1978

Lead, Copper and Arsenic Air Pollution has been traced and measured traveling at least 7,000 miles from Manchuria, China to Crater Lake, Oregon exceeding 10 times Crater Lake's typical values. Science News, Dec 12, 1998

Arctic Pesticide Air Pollution - Hundreds of miles away. Pesticides including endosulfan, dieldrin, chlordane, heptachlor and hexachlorocyclohexane have been found in the snow of the upper Northwest Territories hundreds, and more likely thousands, of miles from any potential beneficial application. Air samples from Ellsmere Island, the northernmost land in Canada contain all those plus DDT, chlorobenzenes and toxaphene. (Pandora's Poison)

"Chemical Spray may drift, even on a slight breeze, and can kill nearby plants and insects." (Invasive Exotic Plants in Monterey County, brochure by Monterey County Planning Dept #293-0274 4/98)

Monterey County's top goal for its Agricultural Comissioner's office in 2001 is education about minimizing pesticide spray drift. Monterey County 2001-2002 Budget p 282

HOW MUCH DRIFTS? "Some 50 percent [of pesticides applied by aerial crop dusters] to 75 percent miss the target area." BSR p 164 citing - "Pesticide Drift IV: On Target deposits from aerial application of insecticides." J. of Economic Entomology 63: 1982-1983; Reducing Pesticide Application Drift Losses, G. Ware U of Arizona College of Ag.; "The Use of Pesticides in the Cultivation of Cotton in Central America", UN Environmental Programme, 1985 July-September.

"According to the US Dept of Agriculture no more than 2% (and often less than 0.1%) of the insecticides applied to crops by aerial spraying or by ground spraying actually reaches the target pests; less than 5% of herbicides applied to crops reaches the
target weeds."

"No more than 2% of all the insecticide sprayed on a field finds its target, but every spider gets insect meals-or it does not live to reproduce. A typical acre of meadow or woods contains an estimated 50,000 to 2 million spiders, each devouring hundreds
of insects per year."

Because of the loss to "drift" aircraft apply about 30% more pesticide than ground application. (Miller, Living in The Environment, 1999 pg 624)

FRESNO, California, February 20, 2001 (ENS) - A National Cancer Institute researcher who matched pesticide data and medical records in 10 California agricultural counties reported last week that pregnant women living within nine miles of farms where
pesticides are sprayed on fields may have an increased risk of losing an unborn baby to birth defects.

"The smaller the particle - the farther downwind it will travel before settling out." In one experiment 450 pounds (8.6 x 10^15th particles) of two (2) micron particles (Human hair is about 100 microns) of Zinc Cadmium, which flouresces under UV light,
were released from a ship traveling ten miles offshore over a course of 156 miles. The resulting pollution was detected over a land area of 34,000 square miles. Encyclopedia of Biological Sciences, P. Gray, McGraw-Hill 1961

Spray Droplet Size Affects Drift Distance Surfactants can have two effects on droplet surface tension. They can increase or decrease surface tension, but they can not do both.

Increasing surface tension makes larger drops which drift less and do not adhere to plants as well.

Decreasing surface tension makes smaller drops which drift more and absorb better to target plants.

Please specify the maximum drift goal and the droplet size.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Pesticide Drift.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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values.

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33. Please list, describe and quantify all Construction impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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46. Please provide the reverse of this impact as Mitigation.

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48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 242 - TOXIC DRIFT.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Toxic Drift.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Toxic flouride gas emmissions from an aluminum ore reduction plant killed a large stand of trees in Spokane, Washington in the aerly 1950's, and significant foliar damage was observed in an 80 square kilometer (50 square mile) area. Wiley's Encyclopedia,
p 644

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Toxic Drift.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 243 - AIR POLLUTION-AMMONIA

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Ammonia.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Inhalation of ammonia and ammonia vapors, commonly used in fertilizer, can cause serious injury.

"An ammonia spill from the J.M. Smucker Co. plant in North County closed four Pajaro roads and tied up traffic for about three hours Tuesday night." Herald Dec 15 1999

"A dairy rancher in Sonoma County is to appear in court to face criminal charges of polluting a creek with 732,000 gallons of cow waste. The waste went into Washington Creek and then into the Petaluma River five miles away. The high volume of ammonia in
the waste is extremely toxic to fish." Herald Dec 15 1999

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Ammonia.

1b. If no objective criteria are used please state that clearly.

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* 244 - NATIVE TREE PLANTING TO INCREASE AIR CLEANING BENEFITS.

The Document appears to have ignored this potentially feasible Mitigation. Please carefully analyze and disclose the potential benefits of Native Tree Planting to Increase Air Cleaning Benefits.

Trees directly reduce air pollution by removing airborne particulates from the atmosphere and helping to purify the air. California Code 4799.07. The Legislature finds and declares that: (d) Trees directly reduce air pollution by removing airborne
particulates from the atmosphere and helping to purify the air.

Coniferous trees are much more effective (80% reduction in some particulates measured) at filtering air pollution than deciduous trees. "Atmospheric Pollution", Wilfrid Bach, McGraw-Hill 1972 p 117

Please analyze tree planting as mitigation for air pollution.

* 245 - AIR POLLUTION-TOXIC CHEMICALS.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Toxic Chemicals.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This Impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Toxic Chemicals.

1b. If no objective criteria are used please state that clearly..

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 246 - CHLORINE GAS.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Chlorine Gas.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Chlorine at 1000 ppm is normally fatal even if only for a few moments. A concentration of 3.5 ppm produces a delectable odor; 15 ppm causes immediate irritation of the throat. Concentrations of 50 ppm are dangerous for even short exposures; 1000 ppm may
be fatal, even when exposure is brief. [Lewis, R.J. Sax's Dangerous Properties of Industrial Materials. 9th ed. Volumes 1-3. New York, NY: Van Nostrand Reinhold, 1996. 718]**PEER REVIEWED**

Acute toxic levels: The extent of injury depends on the concn and duration of exposure as well as the water content of the tissue involved and the presence of underlying cardiopulmonary disease. ... Estimated clinical effects ... as follows: ... 1-3 ppm:
Mild mucous membrane irritation; ... 5-15 ppm: Moderate irritation of upper resp tract; 30 ppm: Immediate chest pain, vomiting, dyspnea, cough; 40-60 ppm: Toxic pneumonitis and pulmonary edema; 430 ppm: Lethal over 30 min; 1000 ppm: Fatal within a few
min. [Ellenhorn, M.J. and D.G. Barceloux. Medical Toxicology - Diagnosis and Treatment of Human Poisoning. New York, NY: Elsevier Science Publishing Co., Inc. 1988. 878]**PEER REVIEWED**

Chlorine's odor threshold is 0.01 ppm

NIOSH sets a maximum air pollution threshold of 0.5 ppm for 15 mins maximum.

Davis Instruments sells a Chlorine monitor for $517 which measures down to 0.1 ppm. (800 269 0299)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Chlorine Gas.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 247 - AIR POLLUTION-SWIMMING POOL CHLORINE.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Swimming Pool Chlorine.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Swimming Pools (home, apartment or municipal) typically disinfect with poisonous chlorine gas. That gas can be released by fires when heat can rupture the tanks holding the gas, or by other accidents.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Swimming Pool Chlorine.

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3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 248 - HYDROGEN SULFIDE.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Hydrogen Sulfide.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Davis Instruments sells a Hydrogen Sulfide monitor for $375 which measures down to 1.0 ppm. (800 269 0299)

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Hydrogen Sulfide.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this Impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 249 - DUST BLOWN FROM AREAS PERMANENTLY CLEARED OF VEGETATION.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Dust Blown from Areas Permanently Cleared of Vegetation.

If you claim the document contains proof of no-significant-impact for this Impact please explicitly state the page number and paragraph.

"60,000 U.S. residents per year die from breathing particulates at or below legally allowed levels" - EPA, Joel Schwartz The 60,000 figure is taken from "Air Pollution in Typical U.S. Cities Increases Death Risk," press release dated May 13, 1991, from the Harvard School of Public Health, Boston, Mass. describing findings later reported in Joel Schwartz and Douglas W. Dockery, "Increased Mortality in Philadelphia Associated With Daily Air Pollution Concentrations," AMERICAN REVIEW OF RESPIRATORY DISEASE Vol. 145 (1992), pgs. 600-604. Two million deaths occur in the U.S. each year; according to Schwartz and Dockery, fine particles account for 3%.

Areas cleared of vegetation such as dirt parking lots, dirt roads and farms can cause substantial dust air pollution even in mildly windy times.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Dust Blown from Areas Permanently Cleared of Vegetation.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this Impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 250 - SMOKE.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Smoke.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Smoke can cause a number of significant environmental impacts including human death, animal death, human health harm, animal health harm, home and building structure loss, structure damage, habitat loss, aircraft range limits, visual aesthetic loss (ugly skies and orange shadows), and repugnant smells.

Smoke can be made up of a wide range of toxic materials but it can be deadly all by itself. Smoke can be lethal even when there is no fire, just smoldering.

Smoke typically contains dense particulate air pollution.

When burning wild vegetation in California poison oak is often burned as well. Poison Oak in smoke is very harmful to lung and breathing airways.

According to the California state archivist smoke can contain damaging acids. article "Damages at Capitol could top $8 million." AP Feb 10, 01

Smoke from fires colors shadows orange.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Smoke.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

-

* 251 - AIR POLLUTION-TOTAL SUSPENDED PARTICULATES BY CONCENTRATION.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Total Suspended Particulates by Concentration.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"PM10 is about 55 percent of the total TSP [total suspended particulates]; that is a TSP level of 100 micrograms/m^3 is equal to a PM10 measurement of 55 micrograms/m^3)." Economic Analysis of Environmental Impacts, 1996, Dixon et all, Earthscan
Publishing

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Total Suspended Particulates by Concentration.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

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values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

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37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 252 - AIR POLLUTION-PM10 PARTICULATES BY CONCENTRATION.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Air Pollution-PM10 Particulates by Concentration.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"PM10 is about 55 percent of the total TSP [total suspended particulates]; that is a TSP level of 100 micrograms/m^3 is equal to a PM10 measurement of 55 micrograms/m^3)." Economic Analysis of Environmental Impacts, 1996, Dixon et all, Earthscan
Publishing

The concentration of an air pollutant is independent of its weight and more important to safe breathing. No one has ever drowned by being surrounded by a cloud (which can have a mass of millions of pounds), but people often drown in just a few inches or
ounces of water (concentrated cloud).

"60,000 U.S. residents per year die from breathing particulates at or below legally allowed levels" - written by Joel Schwartz EPA The 60,000 figure is taken from "Air Pollution in Typical U.S. Cities Increases Death Risk," press release dated May 13,
1991, from the Harvard School of Public Health, Boston, Mass. describing findings later reported in Joel Schwartz and Douglas W. Dockery, "Increased Mortality in Philadelphia Associated With Daily Air Pollution Concentrations," AMERICAN REVIEW OF
RESPIRATORY DISEASE Vol. 145 (1992), pgs. 600-604. Two million deaths occur in the U.S. each year; according to Schwartz and Dockery, fine particles account for 3%. See also, Michael Weisskopf, "Particles in the Air Help Kill 60,000 a Year, Study Says," WASHINGTON POST May 13, 1991, pg. A13.

"The medical costs associated with the effects of [U.S.] particulate matter are estimated at nearly $4 Billion each year." -San Joaquin Valley Air Pollution Control Dist, Mar. 2000 newsletter.

What are the significance levels used for breathing concentrations versus time for PM10 Particulates?

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-PM10 Particulates by Concentration.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

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13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

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16. Please quantify the length of time this impact would last.

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19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 253 - AIR POLLUTION-PM10 PARTICULATES BY WEIGHT.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Air Pollution-PM10 Particulates by Weight.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"PM10 is about 55 percent of the total TSP [total suspended particulates]; that is a TSP level of 100 micrograms/m^3 is equal to a PM10 measurement of 55 micrograms/m^3)." Economic Analysis of Environmental Impacts, 1996, Dixon et all, Earthscan
Publishing

"60,000 U.S. residents per year die from breathing particulates at or below legally allowed levels" - written by Joel Schwartz EPA

"The medical costs associated with the effects of [U.S.] particulate matter are estimated at nearly $4 Billion each year." -San Joaquin Valley Air Pollution Control Dist, Mar. 2000 newsletter.

According to the MBUAPCD, approximately 40 pounds of PM10 are emitted per acre per day of construction activity.

The San Luis Obisbo Air Pollution Control District states that any activity creating 10 lbs of PM10 or more per day is a potentially significant impact; and any activity creating more than 137 lbs / day of PM10 requires an EIR in all cases.

MBAPCD Significance Level for PM10 Particulates is 82 lbs / day. Their threshold of significance is then just over two acres of construction per day.

What are the significance levels used?

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-PM10 Particulates by Weight.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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32. Please list, describe and quantify all potential compound and synergetic impacts.

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34. Please list, describe and quantify all Growth impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initialed by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 254 - AIR POLLUTION-PARTICULATES SUBPM-10.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Particulates SubPM-10.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Particulates below 5 micrometers are known as smoke and fume, those under 1 micrometer as aerosols. Particles smaller than 10 micrometers remain much longer as suspended matter in the air." Atmospheric Pollution, Wilfrid Bach, McGraw-Hill 1972 p 12

PM 2.5 means 2.5 micron particulates. (Human hair is about 100 microns)

"PM10 is about 55 percent of the total TSP [total suspended particulates]; that is a TSP level of 100 micrograms/m^3 is equal to a PM10 measurement of 55 micrograms/m^3)." Economic Analysis of Environmental Impacts, 1996, Dixon et all, Earthscan
Publishing This means that the remainder, 45%, are particulates smaller than PM 10.

PM 2.5 typically remains in the air for 5 days. "Very small particles in a size range of 1 to 4 microns in diameter are capable of passing the natural anatomical and physiological barriers of the upper respiratory tract (including the turbinates of the nose, the cilia of the trachaea and the larger bronchi) and entering the alveolar bed of the lungs which are highly susceptible to infection." Encyclopedia of Biological Sciences, P. Gray, McGraw-Hill 1961

"The smaller the particle - the farther downwind it will travel before settling out." In one experiment 450 pounds (8.6 x 10^15th particles) of two (2) micron particles of Zinc Cadmium, which flouresces under UV light, were released from a ship traveling
ten miles offshore over a course of 156 miles. The resulting pollution was detected over a land area of 34,000 square miles. Ibid

PARTICULATES: NEW STUDY INDICATES POSSIBLE HEALTH RISKS

"Tiny particles discharged into the air by cars can trigger fatal attacks of lung inflammation, blood clotting and heart attacks in vulnerable people," according to a new report published in the 1/21 issue of the British journal LANCET.

Studies of 14 different locations show that overall daily deaths, particularly from heart and lung disease, increase as the concentration of small particles in the air rises, the report says. Older people and smokers are most at risk. British scientists
suggest that these particles, which are too small to settle or be dispersed by rain, "may be the most important and dangerous aspect of pollution."

But corresponding studies in industrial centers do not show a similar increase in deaths, even in workers exposed to high concentrations of dust, scientists say. Particles from industrial pollution "tend to be larger and settle within hours." (London INDEPENDENT, 1/20).

QUANTIFICATION OF BASELINES AND IMPACTS:

This Impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Particulates SubPM-10.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

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45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 255 - AIR POLLUTION-PM10 SOOT.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Air Pollution-PM10 Soot.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-PM10 Soot.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE Impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this Impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 256 - AIR POLLUTION-PM10 ASH.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Air Pollution-PM10 Ash.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-PM10 Ash.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 257 - DRYING BIOMASS.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Drying Biomass.

If you claim the document contains proof of no-significant-impact for this Impact please explicitly state the page number and paragraph.

The drying of lawn clippings released formaldehyde, methanol, acetyldehyde, acetone and other gases. The drying of millions of acres of cut alfalfa "could be quite a point source of [Volatile Organic Compound (Ozone precursor) pollution]." SciNews Apr 3,
99 citing Geophysical Research Letters, April 1, 99

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Drying Biomass.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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5a. Please state the METHOD of measurement used to determine the significance for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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" 258 - CHIMNEY SMOKE.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Chimney Smoke.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Particulate pollution is blamed for more than 1,600 premature deaths in the San-Bernardino-Riverside area of California. - L.A.'s Lethal Air, Eric Mann, 1991

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Chimney Smoke.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 259 - LIQUID NATURAL GAS FUEL.

The Document appears to have ignored this potentially feasible Mitigation. Please carefully analyze and disclose the potential benefits of Liquid Natural Gas Fuel.

The first permanent Liquified Natural Gas fueling station was dedicated near Coalinga, California Feb 2000. Vehicles (primarily commercial trucks) using this burn a mixture of 85 percent LNG and only 15 percent diesel fuel. This significantly reduces NOX
and diesel particulates. -San Joaquin Valley Air Pollution Control Dist, Mar. 2000 newsletter.

* 260 - COMPRESSED NATURAL GAS FUEL.

The Document appears to have ignored this potentially feasible Alternative. Please carefully analyze and disclose the potential benefits of Compressed Natural Gas Fuel.

The first permanent Liquified Natural Gas fueling station was dedicated near Coalinga, California Feb 2000. Vehicles (primarily commercial trucks) using this burn a mixture of 85 percent LNG and only 15 percent diesel fuel. This significantly reduces NOX
and diesel particulates. -San Joaquin Valley Air Pollution Control Dist, Mar. 2000 newsletter.

ALTERNATIVE FACTUAL ANALYSIS

There is little or no factual evidence in the document showing why this alternative is infeasible.

A. Please clearly identify by name and describe each of the objective (non-subjective) criteria used to determine this Alternative's benefits.

A1. If no objective criteria are used please state that clearly.

A2. If the criteria are different than those used to evaluate the benefits of the proposed project, please explain as it is not generally acceptable to compare apples and oranges.

B. Please state the name of the measurement units (numbers) used to determine the value for Each criteria.

B1. If no measurement units are used please state that clearly.

C. Please state the method of measurement used to determine the value for each criteria.

C1. If no measurement units are used please state that clearly for each criteria.

C2. If no objective criteria are used please clearly describe how the method of measuring value is scientifically credible and defensible.

D. Please state the existing or current baseline measurement (level) for each criteria.

E. Please state the normal variance or fluctuation, assumed or expected for each of the criteria listed above.

E1. If an average is used, please state which kind of average.

E2. Please state the extreme conditions which will be encountered.

F. Please provide a graph of historical measurement.

G. Please state the measured, assumed or expected margin of error for each measurement, calculation, and conclusion and whether it is measured or assumed.

H. Please state the total maximum change, in Percent, to which the Alternative would raise or lower the baseline number.

H1. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

H2. Please state the degree, in Absolute Amount, to which this Alternative would raise or lower the baseline number.

H3. Please state whether this total maximum change amount is an average amount, a best case expected or other.

I. Please state the threshold number at which the value changes from a significant impact to a less-than-significant impact and the clear rationale for that number.

I1. Please provide the margin of error used (in percent and absolute amount) to insure the Significance Threshold Level for this Alternative is not somehow exceeded.

I2. If no margin of error is used please state that clearly.

J. ALTERNATIVE VALUE PROOF Please cite and provide relevant studies that clearly show that the project purposes could not be achieved with this alternative or with this alternative in combination with other alternatives.

J1. Please discuss the limitations of those studies.

BENEFIT DURATION K. Please clearly describe how the benefits vary over the time during the studies.

K1. Please graph the benefits for this alternative versus time in the studies. It is important to know the duration of an Alternative's benefits compared with the benefits from the proposed project.

COSTS L. Please cite the costs for the Alternatives studied.

L1. It is important to know the cost to benefit ratio, please explain that ratio.

M. EXPERT QUALIFICATIONS Please name each expert who prepared and reviewed this Alternative analysis.

M1. Please cite each expert's training, competence and experience specific to this Alternative analysis.

* 261 - AIR POLLUTION-DIESEL VEHICLE EXHAUST.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Diesel Vehicle Exhaust.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Diesel engine exhaust is on California's Prop 65 List of Known Carcinogens.

"Diesel trucks and buses are two of the worst polluters and account for 27 percent of smog and soot produced by all of the nation's motor vehicles. This pollution threatens air quality of wildlife habitat in urban and suburban landscapes."
DENLines,
Friday, Aug 11, 2000 (Defenders of Wildlife newsletter)

"Though they constitute only one in 50 vehicles on California's roads, diesel trucks and buses contributes 60 percent of the soot that comes from motor vehicles and 30 percent of the nitrogen oxides." San Jose Mercury Editorial, May 2000

Diesel exhaust is a toxic soup that contains at least sixteen different carcinogens. Numerous studies on mice and rats have indicated that exposure through inhalation causes cancer. Furthermore, epidemiological studies on occupationally exposed workers
have revealed a strong causal association between diesel exhaust exposure and lung cancer. The report estimates the range of cancer risks associated with diesel exhaust to be 22 to 4,400 potential excess cancers among every million persons. Many experts
consider even one in a million to be a significant health threat.

1) AUTO INDUSTRY: DIESEL FUEL CARCINOGEN FOUND MOST DEADLY Japanese scientists suspect a chemical they detected in the emissions of diesel engines "may be the most carcinogenic ever found, and may be the cause of a rise in urban lung cancers." New

Scientist magazine reported last week that the chemical 3-nitrobenzanthrone was found to cause more cellular mutations than the compound previously thought to be the most carcinogenic, 1,6 dinitropyrene. Researcher Hitomi Suzuki of Kyoto U. called for
more stringent limits on diesel trucks (Baltimore Sun, 10/23).

2) NIOSH ISSUES CANCER ALERT FOR DIESEL EXHAUST FUMES RACHEL'S ENVIRONMENT & HEALTH WEEKLY #120 —March 14, 1989—

The federal government has recently concluded officially that there is another good reason to be concerned about increased truck traffic in your neighborhood: five separate studies in the last 3 years have shown that diesel exhaust certainly causes cancer in laboratory animals, and two studies of railroad workers show that it causes cancer in humans as well. As a result of this determination, the National Institute for Occupational Safety and Health (NIOSH) has issued a special publication,
CARCINOGENIC EFFECTS OF EXPOSURE TO DIESEL EXHAUST, offering this recommendation:

"As prudent public health policy, employers should assess the conditions under which workers may be exposed to diesel exhaust and reduce exposures to the lowest feasible limits." Citizens may reasonably ask: if NIOSH believes workers should not be
exposed to diesel exhaust because of the cancer hazard, can health officials in other parts of government believe that the general public should continue to be exposed to diesel exhaust? Taken in this light, risk assessments that discuss only the traffic
hazards associated with a facility are missing the major point: diesel trucks can evidently kill innocent people even if no traffic accidents occur."

Diesel engines use a less-refined (thus cheaper and more plentiful) fuel. When diesel fuel burns in an engine's combustion chamber, the resulting exhaust contains gases and particles (soot). The gases include nitric oxide, nitrogen dioxide, oxides of
sulfur, and hydrocarbons (e.g., ethylene, formaldehyde, methane, benzene, phenol, 1,3 butadiene, acrolein, and polynuclear aromatic hydrocarbons [PAHs], several of which are known carcinogens). Of the particles in diesel exhaust, 95% are less than 1
micron in diameter and thus they are respirable, which is to say they are easily taken into the deepest portions of the human lung where they may lodge forever. The core of each particle is made up of pure carbon, but as many as 18,000 different
chemicals from the gaseous portion of the exhaust may be adsorbed (attached) onto the carbon core, and thus diesel exhaust can carry a whole host of exotic, toxic and carcinogenic chemicals into the deepest portions of your lung-down in the region where
the transfer of gas occurs to put oxygen into your blood stream and to take carbon dioxide out.

As recently as 1986, NIOSH concluded that diesel exhaust did not cause cancer in laboratory animals. However, in the period 1986-1988, five long-term animal studies, and two epidemiologic studies of humans, all concluded that exposure to diesel exhaust
causes lung cancer. As a result, NIOSH reversed itself and in August, 1988, issued a special "current intelligence bulletin" to get the word out that diesel fumes are dangerous. NIOSH estimates that 1.35 million American workers are routinely exposed to
diesel exhausts.

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(1) CARCINOGENIC EFFECTS OF EXPOSURE TO DIESEL EXHAUST [CURRENT INTELLIGENCE BULLETIN 50; DHHS (NIOSH) PUBLICATION NO. 88-116]. Cincinnati, OH: Division of Standards Development and Technology Transfer, NIOSH, Robert A. Taft Laboratories [4676 Columbia Parkway, Cincinnati, OH 45226], August, 1988; phone (513) 5338287. It's 30 pages and free.

July 18, 1997 Calif ARB Releases Report on Listing Diesel Exhaust as a Toxic Air Contaminant

After spending eight years evaluating the health effects of exposure to diesel exhaust, the California Air Resources Board (ARB) and California Office of Environmental Health Hazard Assessment (OEHHA) have released a report recommending the listing of
diesel exhaust as a toxic air contaminant (TAC).

Under state law, the ARB is required to identify a substance as a TAC if the substance is "an air pollutant which may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to
human health." Due to both its carcinogenic potential and its non- carcinogenic respiratory effects, diesel exhaust clearly qualifies as a TAC.

Not only does diesel exhaust have carcinogenic health effects, but it also has noncancer pulmonary effects. Diesel exhaust is a major contributor to particulate pollution, which U.S. EPA estimates causes the premature death of 35,000 people each year.
The wealth of evidence behind the EPA's new standard for fine particulates demonstrates the serious health consequences for everyone, but especially for sensitive populations, such as children, the elderly, and those with heart and lung disease.

The ARB/OEHHA report may even underestimate risk. It does not take into account exposure to spikes in diesel exhaust, though we know that short-term exposures to high concentrations of particulate matter are dangerous. It also does not adequately address
the increased risk to sensitive populations or combined effects of simultaneous exposure to diesel exhaust and other carcinogens.

The evidence is clear that diesel exhaust poses a hazard to human health. Since ARB and OEHHA have been evaluating diesel exhaust since 1989, listing as a TAC is now long overdue.

Labware Direct (1 800 356 0783) sells Diesel exhaust detection system measuring concentrations of "High Class" hydrocarbons as low as 100 ppm; "Low Class" hydrocarbons as low as 0.05%; and petroleum distillates as low as 0.5 mg/Liter.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Diesel Vehicle Exhaust.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

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16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

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20b. If no margin of error is used please state that clearly.

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22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

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35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 262 - AIR POLLUTION-DIESEL DELIVERY VEHICLE EXHAUST PARTICULATES.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Diesel Delivery Vehicle Exhaust Particulates.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Delivery vehicles almost always use diesel engines. Delivery vehicles almost always leave their engines running when unloading. Stopped, running Delivery vehicles have impacts from the exhaust, noise and "parking" if you can call slopping in a roadway parking.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Diesel Delivery Vehicle Exhaust Particulates.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

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12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

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21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

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38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

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42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

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46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

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* 263 - AIR POLLUTION-DIESEL VEHICLE EXHAUST PARTICULATES DURING CONSTRUCTION.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Air Pollution-Diesel Vehicle Exhaust Particulates during Construction.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

How many pounds of diesel fuel does each vehicle burn per hour?

How many hours per day will each vehicle operate?

What is the maximum amount of diesel fuel which could be burned by all engines combined per day? Include vehicles (e.g. Bulldozers, Trucks) and stationary sources such as Generators.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Air Pollution-Diesel Vehicle Exhaust Particulates during Construction.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

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* 264 - ELECTROSTATIC PRECIPITATOR FOR DIESEL EXHAUST PIPES.

The Document appears to have ignored this potentially feasible Mitigation. Please carefully analyze and disclose the potential benefits of Electrostatic Precipitator for Diesel Exhaust Pipes.

Electrostatic Precipitators can remove up to 99 percent of particulate pollution from coal fired electric plants. (Environmental Science; Morgan, Moran & Weirsma; W.C. Brown Pub.,1993, p 359) It is reasonable to assume that Electrostatic Precipitators can remove significant percentages and amounts of Diesel particulates.

* 265 - VEHICLE EXHAUST - STARTUP.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Vehicle Exhaust - Startup.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The first five minutes of automobile exhaust causes a very high amount of air pollution.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Vehicle Exhaust - Startup.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 266 - TRUCK EXHAUST.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Truck Exhaust.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Trucks typically burn diesel fuel. There is no regulation of diesel exhaust pollution. Truck exhaust increases as they accelerate from a stop. Truck exhaust increases as they whine uphill.

"Diesel trucks and buses are two of the worst polluters and account for 27 percent of smog and soot produced by all of the nation's motor vehicles. This pollution threatens air quality of wildlife habitat in urban and suburban landscapes."
DENLines,
Friday, Aug 11, 2000 (Defenders of Wildlife newsletter)

"Though they constitute only one in 50 vehicles on California's roads, diesel trucks and buses contributes 60 percent of the soot that comes from motor vehicles and 30 percent of the nitrogen oxides." San Jose Mercury Editorial, May 2000

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Truck Exhaust.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 267 - DELIVERY VEHICLES EXHAUST.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Delivery Vehicles Exhaust.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Delivery vehicles almost always use diesel engines. Delivery vehicles almost always leave their engines running. Stopped, running Delivery vehicles have impacts from the exhaust, noise and "parking" if you can call stopping in a roadway parking.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Delivery Vehicles Exhaust.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

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8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 268 - DOG BARKING.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the potential impacts of Dog Barking.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

"Very Large Dogs, Barking and Howling" can generate 85 decibels. National Institute Deafness, Acoustic consultants and airport consultants, cited by E. Knapp AIA, Architect - Analyst, Eagan MN, Specialist in Animal Facility Design & Planning.

Dogs Barking can make 80 dbA at 10 meters. from "Operational Conditions for Continuous Mining Systems in Hard Rock Open Pit Mines", 15-08-1996

This is about the same noise level as a loud sink garbage disposal.

"Unhealthy noise shall include, but not be limited to, that noise created by a dog barking for 15 continuous minutes." Smithtown, New York Town Ordinance, 1984

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Dog Barking.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20a. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

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36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

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43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 269 - MOVE THE NOISY ACTIVITY.

Each time you double or halve the distance to the noise source, the noise level changes by 6dBA.

This effect can be nullified and even reversed, by noise refelection from smooth surfaces including water, buildings, roads and almospheric inversions.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE: Move the Noisy Activity.

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1. Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure: Move the Noisy Activity. using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure: Move the Noisy Activity. using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Move the Noisy Activity.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what
percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative
or experimental the proposed mitigation measure: Move the Noisy Activity.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental
the proposed mitigation measure: Move the Noisy Activity.

NEW LEVEL IF SUCCESSFUL E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSIs and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these miligations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 270 - ENCLOSE THE NOISY ACTIVITY.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE: Enclose the Noisy Activity.

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure: Enclose the Noisy Activity. using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure: Enclose the Noisy Activity. using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Enclose the Noisy Activity.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what
percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

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D1. TRACK RECORD STUDY Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative
or experimental the proposed mitigation measure: Enclose the Noisy Activity.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental
the proposed mitigation measure: Enclose the Noisy Activity.

NEW LEVEL IF SUCCESSFUL E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSIs and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 271 - ANTINOISE TECHNOLOGY.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE: Antinoise Technology.

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure: Antinoise Technology. using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure: Antinoise Technology. using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Antinoise Technology.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what
percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative
or experimental the proposed mitigation measure: Antinoise Technology.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental
the proposed mitigation measure: Antinoise Technology.

NEW LEVEL IF SUCCESSFUL E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

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E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSIs and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

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G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 272 - REQUIRE MUFFLERS LIMITING NOISE TO AMBIENT.

"Mufflers to reduce noise to ambient and near ambient can be purchased inexpensively off the shelf, or quickly and cheaply adapted for all size construction vehicle engines, generators or any other internal combustion engine. An effective muffler can
even be adapted for a gas powered chainsaw though it may prove bulkier and heavier." David Dilworth, Vehicle Engineer and Designer.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE: Require Mufflers Limiting Noise to Ambient.

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 : Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure: Require Mufflers Limiting Noise to Ambient. using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure: Require Mufflers Limiting Noise to Ambient. using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Require Mufflers Limiting Noise to Ambient.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what
percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative
or experimental the proposed mitigation measure: Require Mufflers Limiting Noise to Ambient.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental
the proposed mitigation measure: Require Mufflers Limiting Noise to Ambient.

NEW LEVEL IF SUCCESSFUL E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary mitigation measure would raise or lower the maximum impact amounts.

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E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSIs and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

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G1. Please explain clearly how the primary mitigation measure will be monitored.

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G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

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G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

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G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 273 - PROHIBIT THE NOISY ACTIVITY AND ENFORCE PENALTIES.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE: Prohibit the Noisy Activity and Enforce Penalties.

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION.

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure: Prohibit the Noisy Activity and Enforce Penalties. using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure: Prohibit the Noisy Activity and Enforce Penalties. using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Prohibit the Noisy Activity and Enforce Penalties.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what
percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative
or experimental the proposed mitigation measure: Prohibit the Noisy Activity and Enforce Penalties.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental
the proposed mitigation measure: Prohibit the Noisy Activity and Enforce Penalties.

NEW LEVEL IF SUCCESSFUL E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

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F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSIs and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary mitigation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT K1. Please list all agencies who will enforce the primary mitigation measure.

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One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

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M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

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MITIGATION LOCATION N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

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EXPERT QUALIFICATIONS Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

" 274 - PROHIBITION AND PENALTIES FOR NOISE EXCEEDING AMBIENT BY 5 DBA BEFORE 9AM.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE: Prohibition and Penalties for Noise Exceeding Ambient by 5 dbA before 9am.

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure: Prohibition and Penalties for Noise Exceeding Ambient by 5 dbA before 9am. using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure: Prohibition and Penalties for Noise Exceeding Ambient by 5 dbA before 9am. using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Prohibition and Penalties for Noise Exceeding Ambient by 5 dbA before
9am.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the mitigation measure has been operating, where in the process the mitigation is now, and what
percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY Please provide a survey reporting the number of times this primary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative
or experimental the proposed mitigation measure: Prohibition and Penalties for Noise Exceeding Ambient by 5 dbA before 9am.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental
the proposed mitigation measure: Prohibition and Penalties for Noise Exceeding Ambient by 5 dbA before 9am.

NEW LEVEL IF SUCCESSFUL E1. Please state the new total number if the proposed primary mitigation measure is successful.

E2. Please state the new total number if the proposed secondary mitigation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary mitigation measure would raise or lower the maximum impact amounts.

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MONITORING FREQUENCY I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary mitigation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary mitigation measure.

EXPERT QUALIFICATIONS Q1. Please name each expert who prepared and reviewed the primary mitigation measure.

Q2. Please name each expert who prepared and reviewed the secondary mitigation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

* 275 - CONSTRUCTION PROHIBITION BETWEEN CERTAIN HOURS.

The Document appears to have ignored this potentially feasible Mitigation. Please carefully analyze and disclose the potential benefits of Construction Prohibition Between Certain Hours.

A typical noise mitigation measure is to prohibit construction between the hours of 5 pm and 9 am.

This measure provides ZERO noise mitigation for people who must be home during the day including infants, immobile people, those who work at home, and those who are retired.

* 276 - PROMOTE DEAFNESS AS AN ASSET.

"A former Toledo Mayor's solution to airport noise was to move in people who were hard of hearing." Unte Reader, "Now Hear This," Sept 1998

"The construction would take place adjacent to the Hearing Center, an agency for the hard of hearing, so there would be no potentially significant environmental noise impact." Environmental Impact Report for Pile Driving, Coughman & Bread Consultants,
January 1999

The first paragraph above is real. The second is fiction.

MITIGATION QUANTIFICATION

PRIMARY MITIGATION MEASURE: Promote Deafness as an Asset.

This Mitigation Measure is of the wrong type, inadequate, not fully enforceable and causes its own potentially significant environmental impacts.

BACK-UP MITIGATION MEASURE:

A1 . Please describe the "Back-up", Secondary or Reserve" Mitigation measure in case the primary mitigation measure fails.

A2. If there is no Back-up Mitigation Measure please state that clearly.

MITIGATION IMPACT REDUCTION

B1. Please state the Absolute Amount of impact reduction contributed by the Primary mitigation measure: Promote Deafness as an Asset. using the same units of measure used to determine the impact.

B2. Please state the Absolute Amount of impact reduction contributed by the Secondary mitigation measure using the same units of measure used to determine the impact.

B3. Please state the impact reduction, in Percent, contributed by the primary mitigation measure: Promote Deafness as an Asset. using the same units of measure used to determine the impact.

B4. Please state the impact reduction, in Percent, contributed by the secondary mitigation measure using the same units of measure used to determine the impact.

TRACK RECORD EXAMPLE C1. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the primary mitigation measure: Promote Deafness as an Asset.

C2. Please cite at least one real world example of successful implementation of an identical or reasonably identical example for the back-up mitigation measure.

This would be an example that is in place and has been self-sustaining for a minimum of 5 years; Include clear descriptions of mitigation measures, how long the miligation measure has been operating, where in the process the miligation is now, and what
percentage of mitigation has been successful, and how successful is defined.

C3. If there are no successful examples for the primary measure - please identify the proposed mitigation measure as speculative or experimental.

C4. If there are no successful examples for the secondary measure - please identify the proposed mitigation measure as speculative or experimental.

D1. TRACK RECORD STUDY Please provide a survey reporting the number of times this primary miligation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative
or experimental the proposed mitigation measure: Promote Deafness as an Asset.

D2. Please provide a survey reporting the number of times this secondary mitigation measure has been attempted, and the ratio of successful vs unsuccessful implementations. If no such study is available - please identify as speculative or experimental
the proposed mitigation measure: Promote Deafness as an Asset.

NEW LEVEL IF SUCCESSFUL E1. Please state the new total number if the proposed primary miligation measure is successful.

E2. Please state the new total number if the proposed secondary miligation measure is successful.

E3. Please state the total change, in PERCENT, to which the primary miligation measure would raise or lower the maximum impact amounts.

E4. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E5. Please state the total change, in PERCENT, to which the secondary miligation measure would raise or lower the maximum impact amounts.

E6. Please state whether this total maximum change percent is an average amount, a worst case expected or a best case expected.

E7. Please state the degree, in ABSOLUTE AMOUNT, to which the primary miligation measure would raise or lower the maximum impact amounts.

E8. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

E9. Please state the degree, in ABSOLUTE AMOUNT, to which the secondary miligation measure would raise or lower the maximum impact amounts.

E10. Please state whether this total maximum change amount is an average amount, a worst case expected or a best case expected.

F1. Please state the deadline when this primary Mitigation Measure must be completed.

F2. Please state the deadline when this secondary Mitigation Measure must be completed.

G. MONITORING Unfortunately most mitigation measures are inadequate or fail or both. "The U.S. EPA studied 1200 Environmental Assessments and FONSIs and estimated that 70% of them contained either inadequate mitigation measures or no mitigation measures.

So the public can determine the probability of the ability of the Agency to enforce the mitigation measures -

G1. Please explain clearly how the primary mitigation measure will be monitored.

G2. Please explain clearly how the secondary mitigation measure will be monitored.

G3. Please explain clearly what date-certain deadlines will be used to determine whether this primary mitigation measure has failed.

G4. Please explain clearly what specific performance criteria will be used to determine whether this primary mitigation measure has failed by the deadlines listed above.

G5. Please explain clearly what date-certain deadlines will be used to determine whether this secondary mitigation measure has failed.

G6. Please explain clearly what specific performance criteria will be used to determine whether this secondary miligation measure has failed by the deadlines listed above.

G7. Please explain clearly which other specific criteria will be used to determine whether the primary mitigation measure has failed.

G8. Please explain clearly which other specific criteria will be used to determine whether the secondary mitigation measure has failed.

G9. Please explain clearly how much money will be needed to adequately monitor these mitigations.

G10. Please explain the source and the quantify the certainty of the money needed to adequately monitor these mitigations.

H1. Please explain clearly how this primary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

H2. Please explain clearly how this secondary mitigation measure will be protected from impacts of future projects and all non-discretionary activities.

MONITORING FREQUENCY I1. Please describe carefully how often this primary mitigation measure will be monitored.

I2. Please describe carefully how often this secondary mitigation measure will be monitored.

J1. Please describe clearly how long the primary mitigation should last.

J2. Please describe clearly how long the secondary mitigation should last.

AGENCY ENFORCEMENT K1. Please list all agencies who will enforce the primary mitigation measure.

K2. Please list all agencies who will enforce the secondary mitigation measure.

One of California's few examples of a fully enforceable legal violation is a parking ticket. If the ticket is not paid, ultimately a vehicle's registration will not be renewed.

L1. Please explain clearly how the primary mitigation measure will be fully enforced.

L2. Please explain clearly how the secondary mitigation measure will be fully enforced.

M1. Please explain clearly how long it takes each agency listed above to issue a stop order after a valid complaint is filed.

M2. Please give a specific example of a real complaint that resulted in a stop work order for failure to comply with a mitigation measure for each agency.

MITIGATION LOCATION N1. Please describe the exact physical location(s) for the proposed primary mitigation.

N2. Please describe the exact physical location(s) for the proposed secondary mitigation.

MITIGATION IMPACTS Mitigation measures normally create their own impacts.

O1. Please list all potential impacts from the primary mitigation measure

O2. Please quantify all potential environmental impacts from the primary mitigation measure.

O3. Please qualify all potential impacts from the primary miligation measure.

P1. Please list all potential impacts from the secondary mitigation measure

P2. Please quantify all potential environmental impacts from the secondary mitigation measure.

P3. Please qualify all potential impacts from the secondary miligation measure.

EXPERT QUALIFICATIONS Q1. Please name each expert who prepared and reviewed the primary miligation measure.

Q2. Please name each expert who prepared and reviewed the secondary miligation measure.

Q3. Please cite each expert's training, competence and experience specific to the primary mitigation measure.

Q4. Please cite each expert's training, competence and experience specific to the secondary mitigation measure.

R. What will it cost, in time and money, to replace the loss from the impact?

-

* 277 - HAMMERING NAILS.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the potential impacts of Hammering Nails.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Hammering Nails can generate 130 dBA. The sounds lasts only about 10 ms.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of Hammering Nails.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initialed by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 278 - MONTEREY BAY NATIONAL MARINE SANCTUARY.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the project's potential impacts on Monterey Bay National Marine Sanctuary.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The Monterey Bay National Marine Sanctuary is a federally protected marine area stretching from Marin to Cambria and from the mean high water line to a maximum of 50 miles offshore. It encompasses 276 miles of shore and covers 5,322 square miles. It was
established primarily to protect natural resources. It is home to a rich diversity of living organisms.

National Marine Sanctuaries Act requires Federal Lead agency to consult with Dept of Commerce on any activities "that are likely to destroy, cause the loss of or injure any sanctuary resource." (16 USC Sec 1434 (d))

Aircraft traffic at 500 feet is prohibited within a Sanctuary near wildlife species.

"One of the largest California Sea Lion haulouts in central California is at the end of the Coast Guard pier in Monterey." NOAA comments on Marine Exercise Mar 1, 1999

Federal regulations governing the MBNMS require all DOD activities affecting the Sanctuary to be "carried out in a manner that avoids to the maximum extent practicable any adverse impacts on Sanctuary resources and qualities" 15 CFR Sec 922.132 (c)(1)

MMPA The Marine Mammal Protection Act 1972, USC 16 establishes a moratorium on the taking ("harass, hunt, capture or kill") and importation of marine mammals and marine mammal products, with exceptions for scientific research, allowable incidental
taking, exemptions for subsistence activities by Alaskan natives and hardship exemptions (16 U.S.C. 1371). It requires all private or public actions that intentionally take marine mammals to get a permit.

It covers marine mammals that are: a) morphologically adapted to the marine environment (including sea otters and members of the order Sirenia, Pinnipedia and Cetacia), and b) primarily inhabit the marine environment (e.g., polar bears) FWS covers polar
bears, sea otters, walruses, manatees and dugongs. NMFS covers the rest.

All whales, sea lions, harbor seals and sea otters are protected under the Marine Mammal Protection Act. The act was created because of a film of tuna fishermen killing Dolphins.

"Monterey Bay" is in the preliminary list of acoustic hotspots compiled by National Resources Defense Council report Summer 1999 due to Shipping, pleasure craft and the ATOC project. In addition there are regular visits by large military ships,
explosives use proposed by coastal developers (Final EIR Cannery Row Market Place in Monterey), kelp harvesting boats, commercial fishing boats (including deep sea trawlers), and whale watching boats.

Some fishing is conducted at night with blazing light arrays to attract squid and fish. This may violate the MMPA.

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Monterey Bay National Marine Sanctuary.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

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33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Miligation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

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* 279 - CARMEL BAY AREA OF SPECIAL BIOLOGICAL SIGNIFICANCE (ASBS).

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the project's potential impacts on Carmel Bay Area of Special Biological Significance (ASBS).

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Carmel Bay is designated by the state of California as an Area of Special Biological Significance (ASBS).

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Carmel Bay Area of Special Biological Significance (ASBS).

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

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39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

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41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Miligation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

* 280 - CARMEL BAY ECOLOGICAL RESERVE.

The Document appears to have ignored this potentially significant Impact. Please carefully analyze and disclose the project's potential impacts on Carmel Bay Ecological Reserve.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

Invertebrates may not be taken. No commercial fishing exept kelp harvesting. This includes all waters inshore of a line from Pescadero Pt to Granite Point in Point Lobos. It also includes the unattached "Pinnacles" underwater rocks.

QUANTIFICATION OF BASELINES AND IMPACTS:

This Impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Carmel Bay Ecological Reserve.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

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25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

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27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.

42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.

43. Please name each EXPERT who prepared and reviewed this impact.

44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.

45. Please provide AVOIDANCE MITIGATION for this impact.

46. Please provide the reverse of this impact as Mitigation.

47. Please provide an ALTERNATIVE which avoids this impact.

48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

" 281 - POINT LOBOS STATE RESERVE.

The Document appears to have ignored this potentially significant impact. Please carefully analyze and disclose the project's potential impacts on Point Lobos State Reserve.

If you claim the document contains proof of no-significant-impact for this impact please explicitly state the page number and paragraph.

The marine portion of Point Lobos is an Ecological Reserve, a DFG classification. No fishing or taking of any kind permitted. "It is illegal to disturb or take any plant or marine life within the reserve or or within the adjoining underwater Ecological Reserve." -California Coastal Access Guide, California Coastal Commission 1981

QUANTIFICATION OF BASELINES AND IMPACTS:

This impact appears to be potentially significant.

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance on Point Lobos State Reserve.

1b. If no objective criteria are used please state that clearly.

2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.

3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.

3b. Please quote the definition used.

4. If no measurement units are used please state that clearly.

5a. Please state the METHOD of measurement used to determine the significance for each criteria.

5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.

6. Please quantify the existing or current BASELINE measurement (level) for each criteria.

7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.

8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.

9. Please state the variance's MARGINS of ERROR or confidence level.

10. Please state whether this MARGIN of ERROR is measured or assumed.

11. If an average is used, please state which kind of average.

12. Please state the most extreme values which could be encountered.

13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.

14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.

15. Please provide a graph of HISTORICAL measurements.

16. Please quantify the length of time this impact would last.

17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear criteria and rationale for that number.

19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.

20s. Please state whether this MARGIN of ERROR is measured or assumed.

20b. If no margin of error is used please state that clearly.

21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.

22. Some impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships. Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold
values.

23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

24. Please state whether the MARGIN of ERROR is measured or assumed.

25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.

26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.

27. Please state whether the MARGIN of ERROR is measured or assumed.

28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.

29. Please list all potential CUMULATIVE impacts related to this one.

30 Please describe all potential CUMULATIVE impacts related to this one.

31. Please quantify all potential CUMULATIVE impacts related to this one.

32. Please list, describe and quantify all potential compound and synergetic impacts.

33. Please list, describe and quantify all Construction impacts related to this one.

34. Please list, describe and quantify all Growth impacts related to this one.

35. Please list, describe and quantify all Indirect impacts related to this one.

36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.

37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.

38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.

39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.

40. Please state whether the margin of error is measured or assumed.

41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.