

4.3 PUBLIC HEALTH

As described in detail below, impacts of the Modified Project on public health and safety are expected to be less than those of the Approved Project and will remain less than significant.

4.3.1 Summary of Project Changes Related to Public Health and Safety

The replacement of SunCatchers for PV technology would result in changes to the construction and operation of the Modified Project as described in detail in Section 4.2, Air Quality.

4.3.2 Changes in Environmental Impacts

As with the Approved Project, construction of the Modified Project would not affect public health and safety. As previously stated in the Commission Decision, the short-term duration of construction activities is not adequate to evaluate chronic (long-term) health effects. Assessment of such effects typically assumes continuous exposure to toxic substances over a period of from 8 to 70 years. In its decision, the Commission stated that they "did not conduct a quantitative assessment of construction impacts on public health given the distance from the site to the sparsely populated area surrounding the site and based on the Commission's prior experience using quantitative risk assessment tools showing that construction vehicle emissions impacts are generally less than significant." (Commission Decision, Public Health p. 4). As the basis for the Commission's Decision apply equally to the Modified Project, construction impacts on public health would remain less than significant under the Modified Project.

During operation of the Modified Project, the diesel-fueled emergency generator would be the only stationary source that would emit Toxic Air Contaminants (TACs). Its expected usage has not changed under the Modified Project. The fire water pump would remain electric and all operations and maintenance vehicles would remain either electric or gasoline-powered.

Criteria pollutant emissions from operation activities under the Modified Project were estimated and are presented in Section 4.2, Air Quality. These emissions are less than the Approved Project's emissions. Since the Modified Project's operations and maintenance vehicle fleet mix would be smaller than under the Approved Project, TAC emissions are expected to decrease. The Modified Project would not result in additional TAC emissions, thus no new or more severe impacts to public health and safety would result from the Modified Project.

4.3.3 Changes in Cumulative Environmental Impacts

The Commission Decision concluded that the Approved Project would not result in any significant cumulative impacts to public health and safety. Incremental impacts of the Modified Project on Public Health and Safety are expected to be the same or slightly reduced compared to the Approved Project. As described in Section 1.4.1, Cumulative Scenario, no new reasonably foreseeable future actions beyond those assumed in the Commission Decision have been identified. Therefore, no increase in cumulative impacts under the Modified Project is anticipated.

4.3.4 Changes in LORS Conformance and Other Permits

In the Commission Decision, the Commission concluded that, with the implementation of the Conditions, the Approved Project would comply with all applicable LORS. As with the Approved Project, the Modified Project would comply with all applicable LORS, and no new or additional LORS have been identified.

4.3.5 Changes in Proposed Mitigation

No new or more severe impacts requiring additional mitigation would result from the Modified Project. The mitigation measures proposed in the Commission Decision would mitigate impacts associated with the Modified Project to levels that would be less than significant.

4.3.6 Changes in Conditions of Certification

The Commission Decision did not contain Conditions for public health and safety. Many of the Conditions proposed to mitigate impacts to air quality would also mitigate impacts to public health and safety. As no additional mitigation would be required, the Modified Project would not result in new Conditions.