

## 22.1 INTRODUCTION

NEPA legislation requires that an EIS describe “any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented.” NEPA legislation also requires that the EIS describe “the relationship between local short-term uses of man’s environment and the maintenance and enhancement of long-term productivity...” (42 U.S.C. § 433 (C)(iv)).

This chapter focuses on those two concepts and describes commitments for the No Action and Build Alternative:

- the permanent commitment of resources as compared to the benefits of the proposed Project; and
- the relationship between expending environmental resources in the short-term and gaining productivity in the long-term.

## 22.2 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

The No Action Alternative, by definition, would not irreversibly or irretrievably commit resources. However, it would require a greater commitment of resources in the future due to its failure to improve the reliability of public transportation services during emergencies and produce electricity more efficiently than the commercial power grid.

Resources that may be irreversibly and irretrievably committed to the proposed Project include construction materials, energy, labor, funds, and land. These resources are not limited in supply; however, their use would not have an adverse impact on their continued availability for other projects. Natural gas, fuel, and non-recyclable materials used in construction and operation would represent irretrievable commitments of non-renewable resources that would not be available for use in other projects. The Build Alternative would consume approximately 10.38 million British Thermal Units (MMBtus) of natural gas annually (5 turbines operating at 237 MMBtus/hour for 8,760 hours per year). The total commitment of funds required for construction of the proposed Project is approximately \$546,353,085 million<sup>23</sup>. Labor expenditures would be consistent with governmental incentives to spur growth. The proposed Project would require a relatively small commitment of land (approximately 26 acres); the Main Facility (Preferred Alternative Project Component A) and natural gas pipeline

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<sup>23</sup> Note that the DISTRIBUTED GENERATIONS SOLUTIONS project is also included in the overall project funding of \$546 million. This project is being reviewed separately under NEPA as discussed in Chapter 1, “Purpose and Need.”

connection (Preferred Alternative Project Component B) would be built on a brownfield site within a Redevelopment Area, which would support local land use objectives.

### **22.3 SHORT-TERM USES AND LONG-TERM PRODUCTIVITY**

The No Action Alternative would not require construction and thus would not result in any short-term impacts, either adverse or beneficial, or changes in long-term productivity.

Construction of the Build Alternative would cause relatively minor construction-period impacts and, at the same time, create jobs and related economic benefits during construction. The proposed Project is consistent with state and national energy goals, which encourage investment in microgrids to meet the long-term diversified and resilient energy demands. Investment in the proposed Project now would forestall future declines in productivity that would otherwise result from a lack of investment in the regional transportation system.