

# EXECUTIVE SUMMARY

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## ES-1 INTRODUCTION

The City of Irwindale has prepared this Environmental Impact Report (EIR) to provide information about the potential environmental effects associated with the Olive Pit Mine and Reclamation Project (Proposed Project or Olive Pit) to the public, governmental, and/or responsible agencies, and other interested parties. The Proposed Project site is located within the City of Irwindale, Los Angeles County, California. The proposed mining and site reclamation activities constitute a “project” under the California Environmental Quality Act (CEQA) as they require discretionary approval by the City of Irwindale (State CEQA Guideline §15378). The City of Irwindale is the Lead Agency under CEQA (State CEQA Guideline §15367).

This EIR was prepared in compliance with CEQA [Public Resources Code §§21000-21178] and the 2014 State CEQA Guidelines [California Code of Regulations, Title 14, Chapter 3, §15000-15387]. As defined by State CEQA Guideline §15121, this EIR is an informational document intended to inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information which may be presented to the agency. CEQA requires that State and local government agencies consider the environmental consequences of projects over which they have discretionary authority. It is not the purpose of an EIR to recommend either approval or denial of a project. Rather, an EIR is a document whose primary purpose is to disclose the potential environmental impacts associated with an action or project.

Pursuant to State CEQA Guideline §15123, this chapter presents a brief summary of the proposed action and the potential consequences. Also identified within this chapter are the potentially significant impacts (air quality exceedance of daily NO<sub>x</sub> emissions thresholds) and required mitigation measures; alternatives to the Project including those that would avoid the potentially significant effect; areas of controversy known to the Lead Agency; and issues to be resolved including the choice among alternatives and how best to mitigate the potentially significant effects.

The reader should review, but not rely exclusively on the Executive Summary as the sole basis for judgment of the Proposed Project and Alternatives. The complete EIR should be consulted for specific information about the potential environmental effects and implementation of the mitigation monitoring and reporting program.

## ES-2 SUMMARY OF THE PROPOSED PROJECT

The Olive Pit is located at 4407 Azusa Canyon Road, City of Irwindale, within Los Angeles County, California. The site is located along the south eastern boundary of Irwindale. The Olive Pit mine is an approximate 190-acre site and is generally bounded by Olive Street to the north,

## EXECUTIVE SUMMARY

Azusa Canyon Road to the east, Los Angeles Street to the south, and both Phelan Avenue and Park Avenue to the west.

The City of Baldwin Park is adjacent to the site along the north and west sides, and a portion of the south side (on the west). The City of West Covina is adjacent to the site on the south of the site. The Olive Pit is generally bounded by Olive Street to the north, Azusa Canyon Road to the east, Los Angeles Street to the south, and both Phelan Avenue and Park Avenue to the west. A number of light industrial land uses, such as Huy Fong Foods, Pepsi Bottling Group, Decore-active Specialties, and Ready Pac Foods are found to the east and south. Residential land uses are located adjacent on the north, south, and west. (Refer to Figure ES-1 Regional View, Figure ES-2 Regional Surrounding Land Uses, Figure ES-3 Olive Pit Location. Surrounding land uses are presented in Table ES-1.

<b>Table ES-1 Surrounding Land Uses</b>		
<b>Direction</b>	<b>Existing Land Use</b>	<b>General Plan Land Use Designation / Zoning</b>
North	Residential (Baldwin Park)	Single Family Residential
South	Light Industrial (City of Irwindale) Residential (West Covina) Residential and Light Industrial (Baldwin Park)	Commercial / Industrial Manufacturing / Industrial Manufacturing General Industrial
East	Industrial (City of Irwindale)	Manufacturing / Industrial
West	Residential (City of Irwindale) Residential (Baldwin Park)	Residential Single Family Residential and Public Facilities
<i>Source: City of Irwindale General Plan Update (2008), City of Irwindale Zoning Map, and City of Baldwin Park 2020 General Plan (2002), City of West Covina (1985) and City of Baldwin Park Zoning Map (2006).</i>		

The Proposed Project involves three components: 1) construction of a new on-site access road and relocation of the on-site access point; 2) phased extraction of mineral resources (Phase I and II); and 3) site reclamation (Phase I and II) to recycle the property for future reuse. The proposed project phasing and timeline is presented in Table ES-2 below.

The first operational phase at the site will include mining extraction of the eastern portion of the site, followed by reclamation of this area to create an approximately 32-acre pad suitable for future development. Reclamation will involve filling the extraction void with compacted inert fill materials. The second operational phase will include mining extraction of the remainder of the site utilizing both dry and underwater mining extraction processes. Reclamation of the Phase II area will be completed as final slopes become available for this purpose. Final reclamation will be limited to stabilization of slopes created during extractive operations.

## EXECUTIVE SUMMARY

The Proposed Project is expected to yield approximately 32-million tons of recoverable aggregate reserves that meet the quality standards of applicable California governmental agencies. Average production is anticipated to be 1 million tons of aggregate per year beginning in 2015. Mining Extraction will occur for a period of approximately 32 years with concurrent filling operations for reclamation commencing in the first of two phases. Final reclamation of the eastern 32 acres will involve backfilling and compaction to street level for potential future urban development.<sup>1</sup> The remainder of the property will be reclaimed for the potential end land use of storm water retention and groundwater recharge, and/or flood control facility, and/or open space recreational land uses.

<b>Table ES-2</b>			
<b>Project Anticipated Timeline for Project Components and Project Phasing</b>			
<b>Access Road Construction</b>			
<b>Access Road</b>	12 months	2015	2015
<b>Operations</b>			
<b>Phase I Extraction</b> Yield ± 4 million tons Extraction ± 1 million tons/year	4 years	2016 – 2020	2020
<b>Phase I Reclamation</b> Commence after Phase I extraction is complete	15 years	2020 – 2035	2035
<b>Phase II Extraction</b> Yield ± 28 million tons Extraction ± 1 million tons/year	28 years	2020 – 2048	2048
<b>Phase II Reclamation</b> Commence after Phase II extraction is complete	Final reclamation will be completed within 5 years following completion of all extractive operations	2048-2052	2052

<sup>1</sup> Post-reclamation land use development(s) at the Olive Pit is not a part of the Proposed Project. This project is limited to zoning to allow the extraction, and preparation of the site to a state that will allow future development. The project does not involve re-planning the project site. As such, the environmental analysis of the Proposed Project will be limited to potential impacts from the new access road, extraction, and the proposed reclamation plan. Future potential development, which may occur in 32 years is speculative at this point in time, and will be required to undergo independent environmental analysis pursuant to CEQA, as applicable at the time they are proposed. Any impacts from future development will be considered under growth-inducing impacts.

# EXECUTIVE SUMMARY

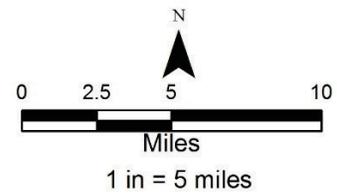
## Figure ES-1 Regional Map



Figure ES-1

### Regional View

-  County Boundaries
-  Olive Pit Project
-  City of Irwindale Boundary



Notes: January 2014  
Source: ESRI

# EXECUTIVE SUMMARY

## Figure ES-2 Vicinity Map

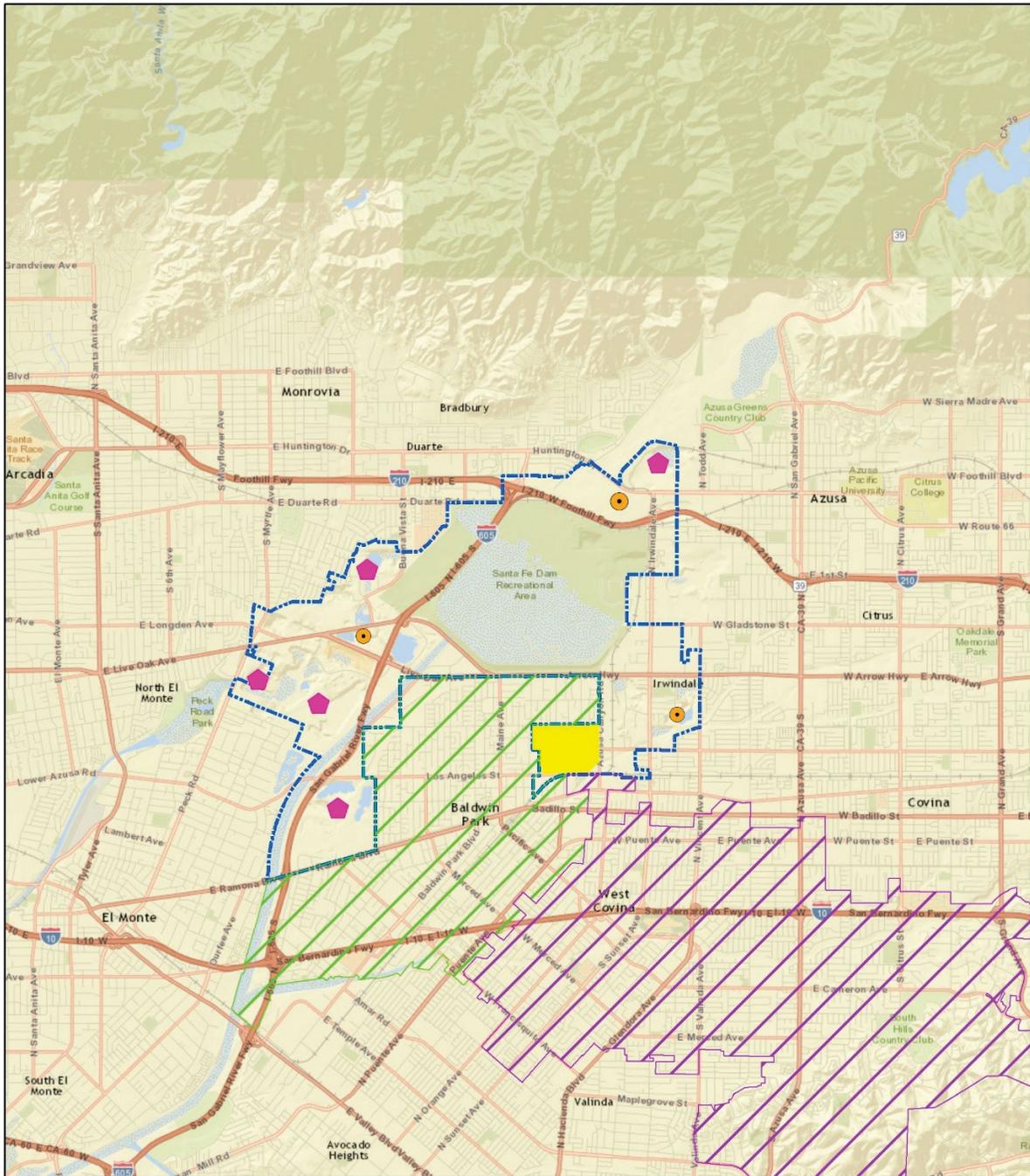
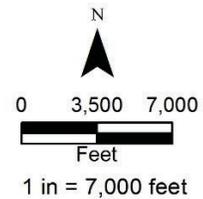


Figure ES-2

### Regional Surrounding Land Uses

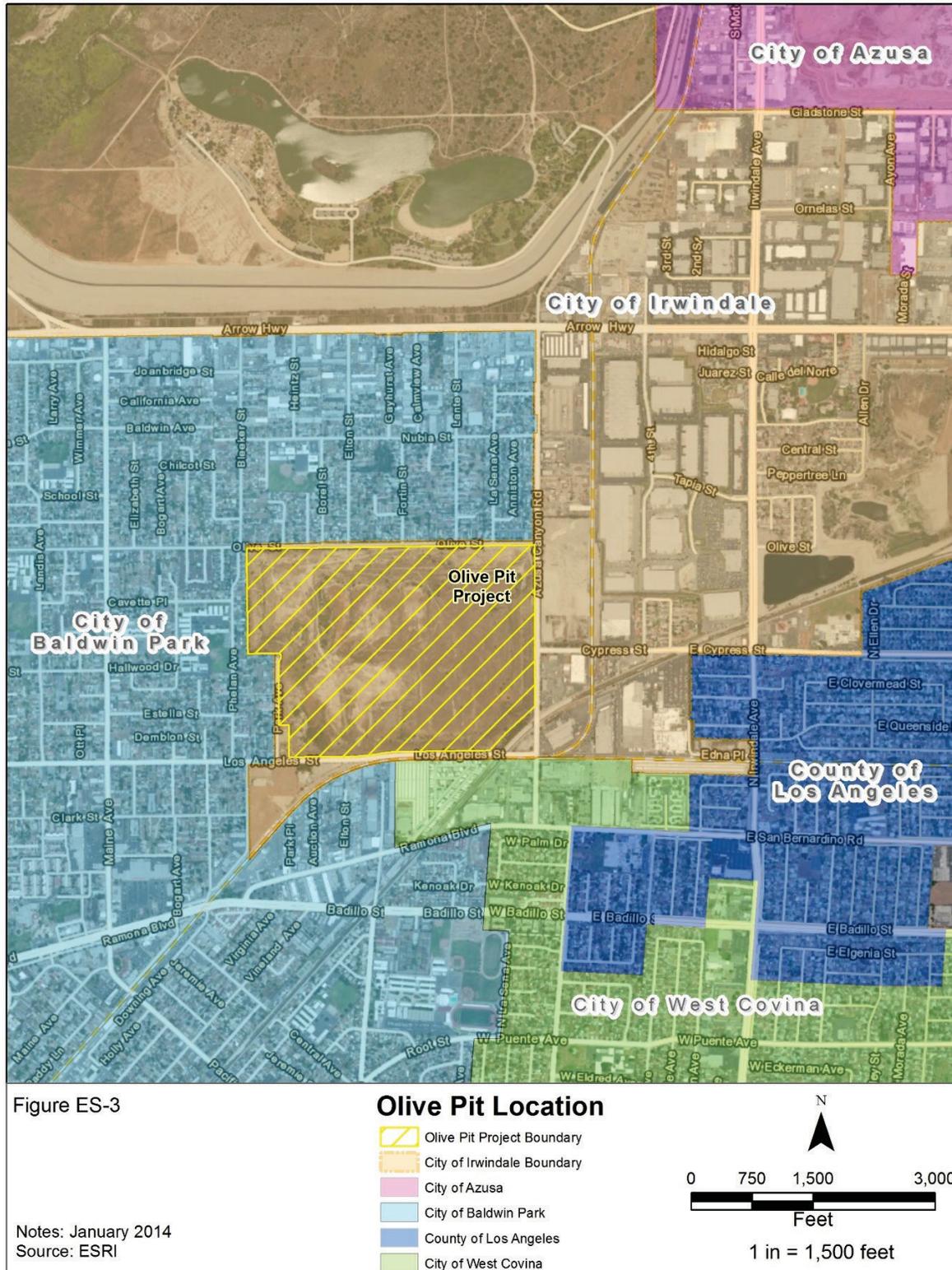
- City of West Covina
- City of Irwindale Boundary
- City of Baldwin Park
- Olive Pit Project
- Landfill Operations
- Existing Quarries



Notes: January 2014  
Source: ESRI

# EXECUTIVE SUMMARY

## Figure ES-3 Location Map



## EXECUTIVE SUMMARY

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### ES-3 STATEMENT OF PROJECT OBJECTIVES

Pursuant to State CEQA Objectives 15124(b), the Project Description shall include a statement of objectives. These objectives assist the City in developing a reasonable range of alternatives to evaluate in the EIR, and aid the decision-makers in preparing findings or a statement of overriding considerations, if necessary. The objectives are designed to demonstrate the underlying purpose of the project. The City of Irwindale has identified the following list of objectives for the Proposed Project.

#### City of Irwindale Project Objectives

- Recovery of aggregate materials by extraction of remaining resources that have been designated as a Regionally Significant Construction Aggregate Source by the State Mining and Geology Board (SMGB), identified as having statewide and regional significance.
- Extraction of all economically recoverable mineral resources from the Olive Pit to provide the Los Angeles Basin with construction aggregate materials.
- Reclamation of the Olive Pit property for use of a portion of the site for future land development that would provide economic development opportunities for the city, including providing jobs and/or tax revenue. The remainder of the site would be retained for public uses, such as storm water retention, flood control facility, groundwater recharge basin, and/or open space recreational land uses<sup>2</sup>.
- Reclamation of the Olive Pit site consistent with reclamation policies of the State Surface Mining and Reclamation Act (SMARA).
- Further the goals of the Irwindale General Plan policies, including the following:
  - *City of Irwindale General Plan, Resource Management Element Policy 4*; The City of Irwindale will continue to protect the use of the area's resources through appropriate land use controls and planning.
  - *City of Irwindale General Plan, Resource Management Element Policy 12*; The City recognizes the mineral information classified by the California State Geologist and incorporated by the State Mining and Geology Board into the State Mining and Geology Board Reclamation Regulations, at Section 3550.5 for Sectors D and E. Through measures in this Element, City will encourage the conservation and development of identified mineral deposits, subject to environmental considerations and the City's discretionary authority over land use entitlements.

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<sup>2</sup> See fn. 1, above.

## EXECUTIVE SUMMARY

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- *City of Irwindale General Plan, Resource Management Element Policy 13*; The City will encourage environmental considerations and the City's discretionary authority over land use entitlements, the conservation and possible future extraction of areas classified by the State Geologist and designated by the State Mining and Geology Board Reclamation Regulations as regionally significant mineral deposits through designation of such areas under the City's Quarry Zone overlay or "Q Zone" and attendant standards and regulations.

### **United Rock Products Project Objectives**

- Recovery of aggregate materials by extraction of remaining resources that have been designated as a Regionally Significant Construction Aggregate Source by the State Mining and Geology Board (SMGB), identified as having statewide and regional significance.
- Extraction of all economically recoverable mineral resources from the Olive Pit to provide the Los Angeles Basin with construction aggregate materials.
- Maintenance of United Rock's existing customer base by supplying aggregate resources from production sites within its market area (LA basin). This is important because it reduces regional traffic congestion, air quality impacts, and road maintenance requirements.
- Extend the life of existing processing equipment, thus preventing the requirement to construct similar facilities at other sites.
- Maintain existing work force.

### **ES-4 ISSUES OF CONCERN / AREAS OF CONTROVERSY**

In accordance with State CEQA Guidelines §§15082, 15103, and 15161, the City submitted a Notice of Preparation (NOP) to the State Office of Planning and Research, Clearinghouse and Planning Unit (SCH) on March 18, 2014. In addition to the State Clearinghouse, the City circulated the NOP to various agencies, organizations, and interested parties on or around March 18, 2014.

The NOP was published in the San Gabriel Valley Tribune on March 17, 2014. The SCH number for this Project is 2014031051

The NOP was received at the State Clearinghouse on March 18, 2014; and therefore, the CEQA-mandated 30-day public review period began on March 18, 2014, closing on April 16, 2014.

The purpose of a scoping meeting is to provide the public with information on the Proposed Project; in turn, the scoping process can be helpful in identifying the range of actions, alternatives, mitigation measures and significant effects to be analyzed in depth in the EIR and in

## EXECUTIVE SUMMARY

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eliminating from detailed study issues not found to be significant. A copy of the SCH-stamped NOP, NOP/EIR Distribution List, Notice of NOP, Notice of Scoping Meeting, and comment letters received in response to the NOP and related scoping efforts are included in **Appendix B – Project Scoping Summary Report** of the EIR.

The City did receive comment letters on the NOP from agencies and interested parties, There are no known areas of controversy known to the City of Irwindale for this Project per CEQA Guidelines § 15123(B)(2). The complete index of written comment letters received by the City in response to the NOP and Scoping are presented in **Appendix B** of the EIR.

Written comment letters were received by the City on the NOP from the following agencies:

- State Governor’s Office of Planning and Research
- California Regional Water Quality Control Board, Los Angeles Region
- Main San Gabriel Basin Watermaster
- County of Los Angeles Fire Department
- California Public Utilities Commission
- South Coast Air Quality Management District
- County Sanitation Districts of Los Angeles County
- County of Los Angeles, Department of Public Works
- California Department of Fish and Wildlife
- Native American Heritage Commission

### **Public Scoping Meeting**

A Scoping Meeting was held on Monday, April 7, 2014 @ 6:00PM in the Irwindale Recreation Department Gymnasium located at 5050 North Irwindale Avenue, Irwindale, California 91706. Additionally, the Scoping Meeting was noticed at City Hall, and distributed to individuals and agencies on the NOP Distribution List, as well as property owners within a 500-foot radius of the project site. The notice was provided in both English and Spanish There were no speakers at the public scoping held on this project.

During the public review period on the Notice of Preparation (NOP), the City received comment letters from public agencies (See Appendix B) which were used to determine the scope and content of the EIR. In determining the key environmental issues, the City took into consideration written comments received during the scoping period, as well as assessment of project materials, site reconnaissance, and background research and familiarity with similar extraction and reclamation projects in the City. The City determined that based on the scope and nature of the Proposed Project and existing site conditions, the following are the potential environmental issues associated with the Proposed Project:

- Aesthetics – related to the effect of disturbance of the current site through extraction and reclamation activities;

## EXECUTIVE SUMMARY

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- Air Quality / Greenhouse Gas Emissions / Health Risk Assessment – related to daily truck trips to and from the Olive Pit given existing air quality conditions in the SCAQMD region;
- Biological Resources – given the lack of activity onsite in approximately 40 years and the growth of non-native and native vegetation in the previously disturbed but inactive mine site;
- Geology and Soils – associated with existing slope stability concerns and ensuring slope stability during extraction operations and ensuring adequate compaction during reclamation operations;
- Hazards and Hazardous Materials – associated with substances used or brought on to site or disturbed during extraction and reclamation operations and Project traffic travel.
- Land use – associated with changing the current use of the site from a vacant abandoned mine site;
- Noise Impacts – associated with noises caused by equipment and vehicles used during extraction and reclamation operations and Project traffic travel;
- Traffic Generation and Circulation – associated with re-initiating extraction operations onsite and ensuring that Project traffic travel is confined to streets in Irwindale only; and,
- Water Quality and Hydrology – associated with wet extraction operations and potential for stormwater/groundwater contact and groundwater contamination.

The EIR addresses each of these topic areas of concern or controversy, examines project-related and cumulative environmental impacts, identifies significant adverse environmental impacts and proposed mitigation measures designed to reduce or eliminate potentially significant impacts.

Pursuant to State CEQA Guidelines §15128, the following resources topics were determined not be found significant and are addressed in Chapter 3.1 of this EIR; Agriculture and Forestry Resources, Cultural Resources, Population and Housing, Public Services and Utilities, and Recreation.

### ES-5 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Impacts related to air quality, greenhouse gases, odor, and health risks would be less than significant except for the following, which are significant and unavoidable: 1) Project operation regional NO<sub>x</sub> air quality impacts; and 2) cumulative impacts of NO<sub>x</sub>. Therefore, the Proposed Project would result in a regional cumulative operations impact given that the Basin is in nonattainment for ozone and the Proposed Project would exceed the regional daily emissions thresholds for NO<sub>x</sub>, which is an ozone precursor.

## EXECUTIVE SUMMARY

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Although the City will require the Project to mitigate traffic impacts and pay its fair share toward long-term transportation improvements, involving Azusa Canyon Road / Arrow Highway and the I-605 SB Off-ramp / Arrow Highway, at this time neither the City nor Caltrans have adopted fee programs for traffic improvements. Therefore, the City cannot find with certainty that necessary improvements will be constructed before impacts will occur, and for that reason, traffic impacts are concluded to be significant and unavoidable.

All other impacts from the Project are less than significant or potentially significant impacts that can be reduced to a less than significant impact level with implementation of the mitigation measures include in this DEIR.

### ES-6 PROPOSED PROJECT ALTERNATIVES SUMMARY

State CEQA Guidelines §15126.6 require that an EIR describe and evaluate the comparative merits of a range of alternatives to the project that could feasibly attain most of the objectives of the project but would avoid or substantially lessen significant effects. An EIR is not required to consider alternatives which are infeasible, however, State CEQA Guidelines §15126.6(b) specifies that the EIR shall evaluate alternatives capable of avoiding or substantially lessening significant effects of the project even if these alternatives could impede to some degree attainment of project objectives, or impose additional costs.

The alternatives evaluated in this EIR were identified based on: 1) input from the City; 2) input from the Applicant; (3) input provided by the NOP comment letters; and (4) potential environmental impacts of the Proposed Project identified within the EIR.

The alternatives to the Proposed Project are discussed and analyzed in Chapter 5.0 of this EIR and include the following:

- Alternative 1 - Backfill of Entire Site Alternative;
- Alternative 2 - Backfill to Above Exposed Groundwater Alternative;
- Alternative 3 - Reduced Mining Intensity Alternative; and
- Alternative 4 - No Project Alternative.

Following the descriptions of the alternatives below are Tables ES-3 and ES-4. Table ES-3 compares the potential impacts of the alternatives against the Project and notes whether the impacts are greater (G), lesser (L) or similar (S). Table ES-4 compares each alternative in its ability to attain the basic objectives of the Project as either lesser (L) or similar (S).

#### **Alternative 1 – Backfill of Entire Site Alternative**

This alternative involves the reclamation of the entire 190-acre open-pit mine site and would further the majority of the City's objectives as well as those of United Rock Products. Backfilling the entire site would involve the same construction (newly graded on-site access

## EXECUTIVE SUMMARY

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road) and mining activities as the Proposed Project, However, under this alternative reclamation activities would be modified to backfill the entire 190-acre open-pit mine site. In contrast to the Proposed Project, which would involve reclamation of only the eastern portion of the site, resulting in a 32-acre pad suitable for future land development, this alternative would reclaim the entire site and result in a much larger building pad suitable for future land development. Under this alternative, backfilling of the entire site would result in a longer duration for reclamation activities and is estimated at a total of 100+ years, rather than the 35 years estimated for the Proposed Project. While this alternative would not necessarily result in a street-grade building pad of the entire site, for the purpose of this analysis, it is assumed the building pad could be within 30 feet of the existing street grade [as similarly accomplished in another reclamation project within the City].

This alternative would not reduce the significant unavoidable impacts to air quality or traffic. The differences from the Project are included in the Table ES-3 and ES-4 below.

### **Alternative 2 - Backfill to Above Exposed Groundwater Alternative**

This alternative involves the reclamation of the site to a level approximately 5 or 10 feet above the average historical water table level. This alternative was suggested by one of the agencies in their comments on the NOP.

Similar to the proposed project, this alternative includes the construction of an on-site access road and phased mining and would meet most of the City's objectives as well as those of United Rock Products. This alternative differs from the proposed Project, in that the reclamation activities would include 2 separate post-reclamation land uses. One as a 32-acre building pad [as proposed in the project] and the remainder of the site would be backfilled above the ground water table instead of used as a water retention / storm water basin. Under this alternative, the additional backfilling of the western area of the site would result in a longer duration for backfilling and is estimated at a total of 80+ years, rather than the 35 years estimated for the Proposed Project. The City would determine/specify at a future point in time future post-reclamation land uses.

This alternative would not reduce the significant unavoidable impacts to air quality or traffic. The differences from the Project are included in the Table below.

### **Alternative 3 – Reduced Daily Mining Intensity Alternative**

This alternative is intended to provide a reasonable alternative to the Project which reasonably attains many of the objectives and reduces the Project's identified potentially significant unavoidable impacts to air quality (NOx) and traffic. This alternative would include a 20 to 50 percent reduction in on-site excavation and reclamation activities.

Reducing the significant and unavoidable air quality impact (NOx emissions) below the SCAQMD operational standard of 55 pounds per day to a less-than-significant level would

## EXECUTIVE SUMMARY

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require reducing the daily mining intensity of the Proposed Project. This is due to the fact that SCAQMD standards, like all air quality standards, are evaluated on a daily emissions basis specified as a pound per day threshold. Therefore, in order to reduce daily NO<sub>x</sub> emissions from the Proposed Project's daily mining operations, the amount of aggregate mined per day would have to be reduced in direct proportion to the emissions generated. As a result, use of on-site mining equipment and over-the-road haul truck trips would be reduced, leading to decreased air (NO<sub>x</sub>) emissions.

A reduction in the Proposed Project's daily extraction intensity and over-the-road haul truck trips (131 round trips) would reduce the mining intensity because the daily amount of aggregate mined directly corresponds with the amount transported by over-the-road haul trucks to the nearby but offsite URP processing plant. Thus, limiting the daily over-the-road haul truck trips would limit the daily mining intensity and related air quality impacts as well.

This alternative would reduce the air quality impacts of the project to less than significant. However, long term traffic impacts would remain significant and unavoidable in the absence of City and Caltrans adopted fee programs to ensure that identified long term transportation improvements are constructed. This alternative would be expected to extend out the operations at the site for 15-35 years and therefore would not meet the City and United Rocks' objectives.

The differences from the Project are included in the Tables ES-3 and ES-4 below.

### **Alternative 4 – No Project Alternative**

CEQA requires consideration and analysis of a No Project Alternative. In this case, the No Project Alternative assumes Olive Pit mine site would remain inactive and as an existing open-pit mine site. Under this alternative, mining of aggregate resources [designated as a Regionally Significant Construction Aggregate Source by the State Mining and Geology Board] would not occur at this site. The purpose of the "Regionally Significant Construction Aggregate Source" designation is to identify deposits of prime importance for meeting future construction aggregate demand in the region. Designating a site as a regionally significant construction aggregate resource is designed to make the local land use authority, regulatory agencies and the public aware of the location of these designated mineral resources and to ensure their importance is considered in land-use planning decisions. Due to the high quality of the aggregate material known to occur in the Olive Pit, this alternative would remove a key source of "Regionally Significant Construction Aggregate Source" from availability to meet demands locally within the Los Angeles basin.

Currently, there is no Reclamation Plan for the Olive Pit and no requirement exists to reclaim or backfill the 190-acre site. Therefore, under the No Project Alternative, reclamation of the existing inactive Olive Pit would not occur. Similarly, the possibility for long term economically viable urban land redevelopment or reuse project would not occur under the No Project Alternative.

## EXECUTIVE SUMMARY

This alternative would avoid the significant impacts to air quality and traffic associated with the Project. The differences from the Project are included in the Tables below.

<b>Table ES-3 Comparative Analysis of Environmental Impacts</b>				
<b>Resource Area</b>	<b>Alternative 1 Backfill of Entire Site</b>	<b>Alternative 2 Backfill to Above Exposed Groundwater</b>	<b>Alternative 3 Reduced Daily Mining Intensity</b>	<b>Alternative 4 No Project</b>
Aesthetics	S	S	S	L
Air Quality / Greenhouse Gas Emission / Health Risk Assessment	G	G	L	L
Biological Resources	G	G	G	L
Geology, Soils and Mineral Resources	S	S	S	G
Hazards and Hazardous Materials	S	S	S	L
Land Use and Planning	G	G	G	G
Noise	G	G	G	L
Traffic and Circulation	G	G	G	L
Water Quality and Hydrology	G	G	S	L

## EXECUTIVE SUMMARY

<b>Table ES-4 Comparative Analysis of City of Irwindale Project Objectives</b>				
<b>Project Objective</b>	<b>Alternative 1 Backfill of Entire Site</b>	<b>Alternative 2 Backfill to Above Exposed Groundwater</b>	<b>Alternative 3 Reduced Daily Mining Intensity</b>	<b>Alternative 4 No Project</b>
Recovery of aggregate materials by extraction of remaining resources that have been designated as a Regionally Significant Construction Aggregate Source by the State Mining and Geology Board (SMGB), identified as having statewide and regional significance.	<b>S</b>	<b>S</b>	<b>L</b>	<b>L</b>
Extraction of all economically recoverable mineral resources from the Olive Pit to provide the Los Angeles Basin with construction aggregate materials.	<b>S</b>	<b>S</b>	<b>L</b>	<b>L</b>
Reclamation of the Olive Pit property for use of a portion of the site for future land development that would provide some economic development for the city, including providing jobs and/or taxes, and the remainder of the site for public uses, such as a storm water retention, flood control facility, groundwater recharge basin, and/or open space recreational land uses.	<b>S</b>	<b>S</b>	<b>L</b>	<b>L</b>
Reclamation of the Olive Pit site consistent with reclamation policies of the State Surface Mining and Reclamation Act (SMARA).	<b>S</b>	<b>S</b>	<b>L</b>	<b>L</b>
Further the goals of the Irwindale General Plan policies	<b>S</b>	<b>S</b>	<b>L</b>	<b>L</b>

## EXECUTIVE SUMMARY

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### ES-7 PUBLIC REVIEW OF THE DRAFT EIR

A Notice of Completion (NOC) was submitted to the Los Angeles County Clerk and the State Clearinghouse/Office of Planning and Research on August 14, 2014 initiating the 45-day public comment period. The EIR was available for public review and comment beginning on August 14th, 2014 and ending on September 29th, 2014. Publication of the Draft EIR marked the beginning of the public review period during which the City received written comments at the following address:

Ms. Paula Kelly, Senior Planner  
City of Irwindale  
5050 North Irwindale Avenue  
Irwindale, California 91706  
Telephone: (626) 430-2200/Facsimile: (626) 962-2018

Copies of the Draft and Final EIR are available to the public at the City Clerk's office and the Irwindale Public Library located at 5050 North Irwindale Avenue in the City of Irwindale, California 91706, as well as the City website: <http://www.ci.irwindale.ca.us>.

A total of eight comment letters were received by the City during the Draft EIR public comment period. Letters were received from the following agencies/individuals:

- California Department of Conservation;
- California Department of Transportation;
- California Department of Fish and Wildlife;
- Native American Heritage Commission;
- South Coast Air Quality Management District;
- County of Los Angeles Fire Department;
- City of Baldwin Park and ESA (City's Consultant); and
- Ms. Jacqueline Pineda.

Chapter 8.0 of the *Final EIR* for the *Olive Pit Mine and Reclamation Project* presents each comment letter received on the Draft EIR during the public review period, and provides the City of Irwindale's responses to those comments. Each comment letter is numbered and the issues within each letter are bracketed and numbered. Each comment letter is followed by the City's responses, which are numbered to correspond with the bracketed comment letters. Chapter 8.0 also contains a list of the revisions, corrections and clarifications made to the Final EIR and technical appendices in response to comments received on the Draft EIR.

### ES-8 SUMMARY OF POTENTIAL IMPACTS AND MITIGATION

This EIR addresses the potential environmental impacts related to implementation of the Proposed Project. The EIR also proposes a Mitigation Program intended to reduce significant

## EXECUTIVE SUMMARY

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adverse impacts to a level that is less than significant, where applicable and feasible. Implementation of the Proposed Project may result in the potentially significant impacts summarized below, and which are evaluated in detail in **Chapter 3.0 Environmental Settings and Impact Analysis** of this EIR.

**Table ES-5 Potentially Significant Effects and Mitigation Program** that follows identifies the potential project environmental impacts, mitigation program, and level of significance after implementation of the Mitigation Program.

The Final EIR includes Chapter 9.0 which contains the Mitigation Monitoring and Reporting Program (MMRP). The MMRP provides a verification schedule for the mitigation measures and will be incorporated into the City's Conditions of Approval for this Proposed Project. An initialed box for the date of compliance will be monitored by a designated staff member to indicate the timing of such compliance [i.e., prior to building permit, prior to earthwork activities, etc.] to fulfill the City's monitoring requirements with respect to Assembly Bill 3180 (Public Resources Code §21081.6).

# EXECUTIVE SUMMARY

Table ES-5 Potentially Significant Effects and Required Mitigation Measures Olive Pit Mine and Reclamation Project Final EIR		
Potentially Significant Effects	Proposed Mitigation Measure	Level of Impact After Mitigation
<b>3.2 Aesthetics</b>		
No significant or potential significant aesthetic impacts are anticipated with implementation of the Proposed Project.	No impacts are significant and no mitigation is required.	No impact.
<b>3.3 Air Quality / GHG / HRA</b>		
Air emissions attributable to Project operations are potentially significant, including emissions from vehicles and onsite equipment. GHG emissions from this Proposed Project would be less than significant. Mitigation Measures AQ-1 through AQ-9 would reduce combustion PM10 emissions. Mitigation Measures AQ-10 through AQ-15 would reduce impact of PM10 from fugitive dust. MM AQ-1 through AQ-15 also reduces potential health risk impacts. Daily emissions of NOx cannot be mitigated below the SCAQMD threshold and would remain significant.	<p><b>MM AQ-1</b></p> <p>The Applicant shall ensure that contractors implement a fugitive dust control program pursuant to the provisions of SCAQMD Rules 401, 402, 403 and 1157. This program shall include, but not limited to the following:</p> <ul style="list-style-type: none"> <li>• Prior to start of the initial on-site construction, the City Engineer shall confirm that the proposed construction plan is in compliance with SCAQMD Rule 403, fugitive dust shall be controlled by the applicable best available control measures listed in Table 1 of Rule 403. “Under SCAQMD Rule 403 – Fugitive Dust, the following provisions apply: the project applicant is required to submit a Rule 403 Large Operation Notification to the Executive Officer; 2) a sign is to be posted near the entrance of the facility with a responsible individual’s name and phone number in case there are any fugitive dust control issues at the site; 3) an onsite supervisor with a current fugitive dust control class certification is also required who is available within 30 minutes to respond any fugitive dust control issue at the site during normal business hours; and 4) the operation shall keep onsite records of specific dust control actions taken.</li> <li>• Water or a stabilizing agent shall be applied at least three times daily, preferably in the mid-morning, afternoon, and after work is done for the day,</li> </ul>	Unavoidable significant regional air quality impacts from Project operations (NOx), and for contribution to cumulative impacts of criteria pollutants (NOx).

# EXECUTIVE SUMMARY

**Table ES-5 Potentially Significant Effects and Required Mitigation Measures  
Olive Pit Mine and Reclamation Project Final EIR**

Potentially Significant Effects	Proposed Mitigation Measure	Level of Impact After Mitigation
	<p>to exposed surfaces including graded and disturbed areas in sufficient quantity to prevent generation of dust plumes.</p> <ul style="list-style-type: none"> <li>• Track-out shall not extend 25 feet or more from an active operation and track-out shall be removed at the conclusion of each workday. The contractor shall use a gravel apron, 25 feet long by road width, or a pipe-grid track-out control device to reduce mud/dirt track-out from active operations and unpaved truck exit routes.</li> <li>• A wheel washing system shall be installed and used to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site.</li> <li>• All trucks hauling dirt, sand, soil, or other loose materials are to be covered (e.g., with fabric tarps or other enclosures that would reduce fugitive dust emissions) and maintain a freeboard height of 12 inches.</li> <li>• Traffic speeds on unpaved roads shall be limited to 15 miles per hour.</li> <li>• Operations on unpaved surfaces shall be suspended when winds exceed 25 miles per hour.</li> <li>• On-site stock piles shall be covered or watered at least twice per day.</li> <li>• The Project Applicant shall use street sweepers (using reclaimed water) that comply with SCAQMD Rules 1186 and 1186.1. The street sweepers shall operate for the length of the truck route.</li> <li>• A publically visible sign shall be posted with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours. The SCAQMD’s phone number shall also be visible to ensure compliance with applicable regulations.</li> </ul> <p>With the implementation of MM AQ-1, the impacts are less than significant. Although the impacts are expected to be less than significant with MM AQ-1, the City has developed and the applicant has agreed to further reduce potential emissions by implementing, MM AQ-2 through AQ-6, which are designed to</p>	

# EXECUTIVE SUMMARY

Table ES-5 Potentially Significant Effects and Required Mitigation Measures Olive Pit Mine and Reclamation Project Final EIR		
Potentially Significant Effects	Proposed Mitigation Measure	Level of Impact After Mitigation
	<p>minimize combustion emissions during construction activities.</p> <p><b>MM AQ-2</b> The construction contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer’s specifications to ensure minimum emissions under normal operations.</p> <p><b>MM AQ-3</b> Electricity from power poles rather than temporary diesel- or gasoline-powered generators shall be used. Drag lines or cutter head dredging shall use electricity from power poles rather than diesel or gasoline powered equipment.</p> <p><b>MM AQ-4</b> Heavy-duty diesel trucks shall be properly tuned and maintained to manufacturers’ specifications to ensure minimum emissions under normal operations.</p> <p><b>MM AQ-5</b> Heavy equipment operations shall be discontinued during first and second stage smog alerts.</p> <p><b>MM AQ-6</b> All construction vehicles, both on- and off-site, and construction equipment idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). The construction contractor shall post visible signage within construction equipment operator components notifying equipment operators of the prohibiting against idling in excess of five minutes. The construction contractor shall provide awareness training to equipment operators regarding idling limits.</p> <p><b>MM AQ-7</b> Heavy-duty diesel trucks and onsite equipment shall be properly tuned and maintained to manufacturers’ specifications to ensure minimum emissions under</p>	

# EXECUTIVE SUMMARY

**Table ES-5 Potentially Significant Effects and Required Mitigation Measures  
Olive Pit Mine and Reclamation Project Final EIR**

Potentially Significant Effects	Proposed Mitigation Measure	Level of Impact After Mitigation
	<p>normal operations.</p> <p><b>MM AQ-8</b>                      The Project Operator shall require all on-site off-road heavy-duty equipment greater than 50 horsepower (hp) to meet USEPA Tier 3 and/or 4 emissions standards; based on availability at the initiation of the Project. In addition, all equipment shall be outfitted with the Best Available Control Technology (BACT) devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. A copy of the certified tier specification for each piece of heavy-duty equipment, BACT documentation, and CARB or SCAQMD operating permit shall be provided to the City prior to operation of the Project.</p> <p>At a minimum, the Project Operator shall require upon occupancy that all heavy duty trucks entering the property must meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025.</p> <p>The Project Operator shall require the phase-in for non-diesel powered trucks (e.g., natural gas trucks) as commercially-available and as a part of the bidding process during the replacement of diesel-powered trucks used at the project site.</p> <p><b>MM AQ-9</b>                      All diesel truck operators shall strictly abide by the applicable State law requirements for idling, as described in the Airborne Toxic Control Measure (CCR, Title 13, Section 2485), which limits vehicles with gross vehicular weight ratings of more than 10,000 pounds to no more than five minutes of idling of the primary engine or the diesel-fueled auxiliary power system at any location. Visible signage notifying truck operators of idling limits shall be posted near all site entrances.</p> <p><b>MM AQ-10</b></p>	

# EXECUTIVE SUMMARY

Table ES-5 Potentially Significant Effects and Required Mitigation Measures Olive Pit Mine and Reclamation Project Final EIR		
Potentially Significant Effects	Proposed Mitigation Measure	Level of Impact After Mitigation
	<p>the mid-morning, afternoon, and after work is done for the day, to exposed surfaces including graded and disturbed areas in sufficient quantity to prevent generation of dust plumes.</p> <p><b>MM AQ-13</b> Track-out shall not extend 25 feet or more from an active operation and track-out shall be removed at the conclusion of each workday. The contractor shall use a gravel apron, 25 feet long by road width, or a pipe grid trackout control device to reduce mud/dirt trackout from active operations and unpaved truck exit routes.</p> <p><b>MM AQ-14</b> All trucks hauling dirt, sand, soil, or other loose materials shall be tarped with a fabric cover and maintain a freeboard height of 12 inches.</p> <p><b>MM AQ-15</b> The first 200 feet of the access road shall be paved. The remaining length of the unpaved road shall be treated with dust palliatives and watered for dust control and soil stabilization.</p>	
<b>3.4 Biological Resources</b>		
<p>Implementation of the Project has the potential to result in potentially significant effects on special-status animal species and their habitat, including nesting birds and raptors protected under the MBTA and CFG Code. Mitigation measure BIO-1 is proposed to address this potential issue. Existing native and non-native vegetation onsite would be disturbed with Project implementation. Mitigation measure BIO-2 is recommended to</p>	<p><b>BIO-1</b> Avoidance of Nesting Birds and Raptors. The project applicant shall require that initial grading and vegetation activities (i.e., earthwork, clearing, and grubbing) for Phase I and Phase II are performed outside of the general breeding season for migratory birds and raptors, which is defined as occurring between January 15 and September 15. If activities must occur during the general bird breeding season, the project applicant shall retain a qualified biologist to perform a pre-construction survey of potential nesting habitat to confirm the absence of active nests belonging to migratory birds and raptors afforded protection under the Migratory Bird Treaty</p>	<p>Less than significant with mitigation.</p>

# EXECUTIVE SUMMARY

**Table ES-5 Potentially Significant Effects and Required Mitigation Measures  
Olive Pit Mine and Reclamation Project Final EIR**

Potentially Significant Effects	Proposed Mitigation Measure	Level of Impact After Mitigation
<p>address this potential effect. With mitigation measures BIO-1 and BIO-2, impacts on special-status species and sensitive natural communities would be less than significant.</p>	<p>Act and California Fish and Game Code. The pre-construction survey shall be performed no more than seven days prior to the commencement of the activities. If the qualified biologist determines that no active migratory bird or raptor nests occur, the activities shall be allowed to proceed without any further requirements. If the qualified biologist determines that an active migratory bird or raptor nest is present, no impacts shall occur until the young have fledged the nest and the nest is confirmed to no longer be active, as determined by the qualified biologist.</p> <p><b>BIO-2</b></p> <p>The project applicant shall compensate the loss of 1.0 acre of mule fat scrub through onsite restoration and preservation, which shall be provided in-kind and at a 1:1 ratio for a minimum of 1.0 acre of restored mule fat scrub preserved onsite. The project applicant shall further compensate the loss of 45.6 acres of Diegan coastal sage scrub through onsite restoration and preservation, which shall be provided in-kind and at a minimum 1:1 ratio for a total of 18.0 acres of avoided and enhanced coastal sage scrub preserved onsite and a minimum of 28.7 acres (up to 48.9 acres) of restored coastal sage scrub preserved onsite. Areas preserved onsite shall be designated as open space and placed within a protective easement for conservation purposes, such as a restrictive covenant or conservation easement. Signage and fencing shall be provided at perimeter locations. Fencing design shall be developed to promote safety of life and property, prevent unauthorized access by pedestrians and vehicles into sensitive areas, and allow limited passage for wildlife species in the local area.</p> <p>The project applicant or successors and assigns shall fund the long-term management of the open space, which shall include implementation of area specific management directives for maintenance and biological monitoring. At a minimum, maintenance directives shall include trash removal, treatment of non-native invasive and exotic plants, maintenance of operation BMPs, and fencing and signage upkeep. At a minimum, biological monitoring directives shall include periodic botanical surveys, including botanical inventory and vegetation community assessment; general wildlife surveys; inspections for non-native invasive and exotic plants; inspections for pest and nuisance wildlife species; and</p>	

# EXECUTIVE SUMMARY

**Table ES-5 Potentially Significant Effects and Required Mitigation Measures  
Olive Pit Mine and Reclamation Project Final EIR**

Potentially Significant Effects	Proposed Mitigation Measure	Level of Impact After Mitigation
	<p>reporting. Surveys and reporting shall be done on an annual or five-year basis. Biological monitoring directives shall be performed by a qualified biologist. The project applicant shall retain a qualified biologist to prepare a restoration and enhancement plan for the restored and enhanced areas on the site, to be approved by the City prior to construction, which shall include the following:</p> <p>A. All final specifications and topographic-based grading (with 10-foot contours), planting, and irrigation plans (if irrigation is used). Grading for the restoration areas shall incorporate variability in the topography in a way that mimics natural conditions to the maximum extent practicable while maintaining slope stability and meeting reclamation requirements. All restoration sites shall be prepared for planting by decompacting the top soil in a way that mimics natural top soil to the maximum extent practicable while maintaining slope stability and meeting reclamation requirements. Topsoil and plant materials salvaged from avoided habitat areas onsite shall be transplanted to and/or used as a seed/cutting source for the restoration areas to the maximum extent practicable as approved by the City. Planting and irrigation shall not be installed until the City has approved site grading. All plantings shall be installed in a way that mimics natural plant distribution, and not in rows;</p> <p>B. Planting palettes (plant species, size, and number/acre) and seed mix (plant species and pounds/acre). The plant palette proposed in the plan shall include native species specifically associated with the native vegetation communities or habitat type(s) impacted by the project. At a minimum the following local native species found to occur as dominants within the communities impacted by the project shall be considered for use in the plant palette:</p> <ul style="list-style-type: none"> <li>• elderberry (<i>Sambucus</i> sp.)</li> <li>• laurel sumac (<i>Malosma laurina</i>)</li> <li>• California sagebrush (<i>Artemisia californica</i>)</li> <li>• tarragon (<i>Artemisia dracunculus</i>)</li> <li>• mule fat (<i>Baccharis salicifolia</i>)</li> <li>• California brittlebush (<i>Encelia farinosa</i>)</li> </ul>	

# EXECUTIVE SUMMARY

**Table ES-5 Potentially Significant Effects and Required Mitigation Measures  
Olive Pit Mine and Reclamation Project Final EIR**

Potentially Significant Effects	Proposed Mitigation Measure	Level of Impact After Mitigation
	<ul style="list-style-type: none"> <li>• desert croton (<i>Croton californicus</i>)</li> <li>• deerweed (<i>Acmispon glaber</i>)</li> <li>• white sage (<i>Salvia apiana</i>)</li> <li>• sun cup (<i>Camissoniopsis</i> sp.)</li> <li>• buckwheat (<i>Eriogonum fasciculatum</i>)</li> <li>• toyon (<i>Heteromeles arbutifolia</i>)</li> <li>• deergrass (<i>Muhlenbergia rigens</i>)</li> </ul> <p>Unless otherwise approved by the City, only locally native species (no cultivars) obtained from as close to the project site as possible shall be used. The source and proof of local origin of all plant material and seed shall be provided;</p> <p>C. Container plant survival shall be 80 percent of the initial plantings for the first seven to ten years. At the first and second anniversary of plant installation, all dead plants shall be replaced unless their function has been replaced by natural recruitment;</p> <p>D. A final implementation schedule that indicates when all native habitat impacts, as well as restoration grading, planting, and irrigation, will begin and end. Necessary site preparation and planting shall be completed during the concurrent or next planting season (i.e., late fall to early spring) after City approval of grading. In the event that the project applicant is wholly or partly prevented from performing obligations under the final plans (causing temporal losses due to delays) because of unforeseeable circumstances or causes beyond the reasonable control, and without the fault of negligence of the project applicant, including but not limited to natural disasters (e.g., earthquakes, etc.), labor disputes, sudden actions of the elements (e.g., further landslide activity), or actions or inaction by federal or state agencies, or other governments, the project applicant will be excused by such unforeseeable cause(s);</p> <p>E. Seven to ten years of success criteria for restoration areas, including: a total of 40-65 percent absolute cover; evidence of natural recruitment of multiple species; 0 percent coverage for Cal-IPC List A and B species, and no more</p>	

# EXECUTIVE SUMMARY

<b>Table ES-5 Potentially Significant Effects and Required Mitigation Measures Olive Pit Mine and Reclamation Project Final EIR</b>		
Potentially Significant Effects	Proposed Mitigation Measure	Level of Impact After Mitigation
	than 10 percent coverage for other exotic/weed species; F. A qualitative and quantitative vegetation monitoring plan with a map of proposed sampling locations. Photo points shall be used for qualitative monitoring and stratified, random sampling shall be used for all quantitative; G. Contingency measures in the event of restoration failure; H. Annual mitigation maintenance and monitoring reports shall be submitted to the City after the maintenance and monitoring period and no later than December 1 of each year. Copies shall also be provided to the Department of Fish and Wildlife at their request.	
<b>3.5 Geology, Soils and Mineral Resources</b>		
Project operations could be susceptible to slope stability or trigger landslides given existing factor of safety conditions onsite. Project design features and annual monitoring and reporting are included to address these potential effects.	No impacts are significant and no mitigation is required.	Less than significant.
<b>3.6 Hazards and Hazardous Materials</b>		
Potential hazards and hazardous materials related to the project include the management of waste materials.	No impacts are significant and no mitigation is required.	Less than significant.
<b>3.7 Land Use and Planning</b>		
The Proposed Project has been reviewed in consideration of all of the goals, plans, and policies of the City and with the City's General Plan and	No impacts are significant and no mitigation is required.	No impact.

# EXECUTIVE SUMMARY

Table ES-5 Potentially Significant Effects and Required Mitigation Measures Olive Pit Mine and Reclamation Project Final EIR		
Potentially Significant Effects	Proposed Mitigation Measure	Level of Impact After Mitigation
concludes that the Proposed Project is consistent with the goals and policies of the City's General Plan and other City regulations. The Proposed Project is also consistent with applicable regional land use plans developed by SCAG.		
<b>3.8 Noise</b>		
<p>Noise generation attributable to the Proposed Project includes short term access road construction noise and operational noise associated with extraction, offsite transport for processing and backfilling operations. Noise impacts from Phase I reclamation would be potentially significant and mitigation measure N-1 is required to reduce potential operational noise impacts.</p> <p>With imposition of MM N-1 and MM N-2, the potential noise impacts from Phase I reclamation activities would be reduced to a level acceptable under the City of Baldwin Park and City of Irwindale Noise Standards. The impacts from Phase I reclamation activities would be less than significant with mitigation.</p> <p>Traffic-related noise would be considered less than significant with MM N-3 incorporated.</p>	<p><b>MM N-1</b> Once reclamation backfill has been completed to within 10 feet of the existing street grade, the mine operator shall construct a sound berm 20 feet in height along the entire length of the northern boundary of the backfilled 32 acre pad as a barrier to residences along Olive Street, extending west from Azusa Canyon Road. This berm would be constructed of aggregate extracted from the Olive Pit and would essentially be a stockpile of material that is designed to function as a noise reduction buffer.</p> <p><b>MM N-2</b> The applicant shall prepare an operations plan to reduce noise level along the eastern property boundary to less than 75 dBA Leq during the completion of Phase I reclamation; - Or - The applicant shall obtain a permit from the City authorizing noise along the eastern property boundary in excess of City of Irwindale standards during the completion of Phase I reclamation.</p> <p><b>MM N-3</b> The applicant has included the following mitigation measures as part of the Proposed Project. The applicant shall ensure the following:</p> <ul style="list-style-type: none"> <li>All trucks shall be equipped with Diesel Particulate Filters or a resonator to reduce noise by 3 to 6 dBA.</li> </ul>	Less than significant with mitigation.

# EXECUTIVE SUMMARY

Table ES-5 Potentially Significant Effects and Required Mitigation Measures Olive Pit Mine and Reclamation Project Final EIR		
Potentially Significant Effects	Proposed Mitigation Measure	Level of Impact After Mitigation
	<ul style="list-style-type: none"> <li>No Jake Brakes shall be used.</li> <li>All trucks shall be equipped with single exhaust, vertical straight stacks and no turndown.</li> <li>Trucks shall also be equipped with automatic transmissions to eliminate unnecessary engine revving.</li> </ul>	
<b>3.9 Traffic Generation and Circulation</b>		
<p>Potential traffic and circulation impacts attributable to the project include short term (2016), long term (2035) and cumulative impacts associated with heavy duty transport trucks used to take extracted materials offsite for processing and trucks traveling to the site for backfilling operations. Additional trips related to lighter duty vehicles for employee trips also contribute to traffic impacts. Mitigation measures T-1 through T-4 are address to address potentially significant traffic and circulation impacts. Although the City will require the Project to traffic mitigate impacts and pay its fair share toward long-term transportation improvements, at this time neither the City nor Caltrans have adopted fee programs for traffic improvements. Therefore, because there are no adopted fee programs, the City cannot find with certainty that necessary improvements will get constructed before impacts will occur and traffic impacts will remain significant and</p>	<p><b>T-1</b> The Applicant shall install a traffic signal at the intersection of Azusa Canyon Road/ Los Angeles Street.</p> <p><b>T-2</b> The Applicant shall pay its fair share for the following improvements to mitigate the project’s cumulative impact at the intersection of Azusa Canyon Road / Arrow Highway:</p> <ul style="list-style-type: none"> <li>Modify striping to provide a 3rd eastbound through lane.</li> <li>Modify striping to provide a 3rd westbound through lane and 3rd westbound receiving lane.</li> </ul> <p><b>T-3</b> The Applicant shall pay its fair share for the following improvement to mitigate the project’s cumulative impact at I-605 SB Off-Ramp / Arrow Highway:</p> <ul style="list-style-type: none"> <li>Construct a 2nd southbound left turn lane.</li> </ul> <p><b>T-4</b> The Applicant shall be required to install a traffic signal at the Project Driveway on Los Angeles Street to regulate all ingress and egress movements to and from the site. Final design and operation of the traffic signal is subject to review and approval of the City’s Public Works Director. In addition, the applicant shall construct the Project Driveway / Los Angeles Street intersection with the following geometrics prior to commencement of operations:</p>	<p>Significant and unavoidable.</p>

# EXECUTIVE SUMMARY

<b>Table ES-5 Potentially Significant Effects and Required Mitigation Measures Olive Pit Mine and Reclamation Project Final EIR</b>		
Potentially Significant Effects	Proposed Mitigation Measure	Level of Impact After Mitigation
unavoidable at Azusa Canyon Road / Arrow Highway and I-605 SB Off-Ramp /Arrow Highway.	<ul style="list-style-type: none"> <li>• Southbound Approach: One left turn lane and one right turn lane.</li> <li>• Eastbound Approach: One shared left-through lane and 2nd through lane.</li> <li>• Westbound Approach: Two through lanes and one defacto right turn lane.</li> </ul>	
<b>3.10 Water Quality and Hydrology</b>		
<p>The perimeter of the site will be covered with vegetation landscaping and a wall, preventing off-site runoff from entering the facility.</p> <p>Implementation of the mandatory Erosion and Sediment Control Plan and associated BMPs, as project design features, would reduce any potential degradation of water quality associated with implementation of the Proposed Project to a less than significant level. Project operations could potentially cause erosion and convey silts and runoff to areas within the mine, but have no potential to cause sedimentation of drainages.</p> <p>Therefore, these potential impacts are less than significant. Compliance with San Gabriel Basin Watermaster Resolution No. 3-88-57 regarding inert landfills will ensure groundwater is not adversely impacted.</p>	No impacts are significant and no mitigation is required.	Less than significant impact.

# EXECUTIVE SUMMARY

Table ES-5 Potentially Significant Effects and Required Mitigation Measures Olive Pit Mine and Reclamation Project Final EIR		
Potentially Significant Effects	Proposed Mitigation Measure	Level of Impact After Mitigation
<b>4.0 Mandatory CEQA Considerations</b>		
<p><b>Growth Inducement:</b> The Project would not directly add any new population or housing to the City. While lack of aggregate products could be a potential barrier to growth, it is but one of many such barriers. Numerous factors control where and to what extent growth occurs in Irwindale, the region and throughout California, with aggregate supplies being only one such factor. Further, Project operations will be responsive to the demand for aggregate products. By the time there is a demand for aggregate products, the projects creating the demand are ready to be built and have already been through an independent environmental review process and likely already assessed for potential growth inducement. In conclusion, aggregate extraction may incidentally act to remove one of many barriers to growth, but they does not foster growth directly, and attribution of indirect effects on growth is entirely speculative because all of the other potential barriers to growth that may exist locally and regionally cannot be removed by the provision of sand, gravel and rock products. Therefore, the Project would not directly or indirectly induce growth in the City or the region.</p>		
<p><b>Significant Irreversible Effects and Irretrievable Commitment of Resources:</b> Although the extraction of mineral resources is essentially irreversible, the act of reclamation through backfill at a portion of the mine site with inert material does reverse one prominent effect of mining - namely the existence of an open pit. In addition, it is conceivable that some of the materials extracted at the site could ultimately be used to backfill their site at the end of their economic life. Final reclamation would include dismantling and disposal of equipment and other quarry infrastructure. Changes would include the depth and slopes of the Olive Pit, as they are excavated and subsequently reclaimed.</p>		
<p><b>Significant and Unavoidable Adverse Impacts:</b> With implementation of the Mitigation Program identified within the Olive Pit EIR, the potentially significant environmental impacts identified for resource topics throughout this EIR would be less than significant, with the exception of air quality (daily NOx emissions) and long term traffic impacts at Azusa Canyon Road / Arrow Highway and I-605 SB Off-Ramp /Arrow Highway.</p>		
<p><b>Energy Conservation:</b> The consumption of energy would be derived partially from nonrenewable sources for electricity to power on-site equipment and fossil fuels for project-related vehicle trips. While these changes would be irreversible, they cannot be avoided with Project implementation. The Proposed Project would adhere to all federal, State, and local requirements for energy efficiency as applicable to a mining and reclamation operation. As a result, the Proposed Project would not be expected to result in the inefficient, wasteful, or unnecessary consumption of energy.</p>		