4.0 MANDATORY CEQA CONSIDERATIONS

Pursuant to State CEQA Guidelines §15126, this section contains analysis of the CEQA mandated discussions requiring the consideration of a range of issues extending beyond analysis of project-specific impacts to individual resource areas. The topics included within this section include:

- Growth-Inducing Impacts (CEQA Guidelines §15126.2(d));
- Significant Irreversible Environmental Changes (CEQA Guidelines §15126.2(c));
- Significant Unavoidable Adverse Impacts (CEQA Guidelines §15126.2(b)); and
- Energy Conservation (CEQA Appendix F).

4.1 GROWTH-INDUCING IMPACTS

Public Resources Code Section 21100(a)(5) requires that the potential growth-inducing impacts of a project be addressed in the environmental impact report. A project may have a potential growth-inducing effect if it directly or indirectly fosters economic or population growth or the construction of additional housing, removes obstacles to growth, taxes community service facilities, or encourages or facilitates other activities that cause significant environmental effects.

Pursuant to State CEQA Guidelines §15126.2(d), an EIR must "*discuss the ways in which the Proposed Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment…*". The purpose of this section is to evaluate the potential for growth-inducing effects of the Proposed Project. A project could directly induce growth if it would remove barriers to population growth, such as a change to a jurisdiction's General Plan and Zoning Ordinance to allow new residential development or provision of a vital resource such as a sewer trunk line, without which growth could not occur.

The State CEQA Guidelines require a discussion of growth inducement, but do not require speculation as to exactly when and where growth may or may not occur, and what form that growth may take. Speculation does not provide the reader with accurate or useful information about the Proposed Project's potential effects. In this case, the Project proposes to extract available mineral resources to provide the Los Angeles Basin with sand, rock and crushed rock products used by a variety of industries and uses. In addition, the site will be reclaimed in two phases. Phase I will involve filling the eastern portion of the site with inert materials to create an approximate 32-acre fill pad. Phase II will provide storm water retention and a groundwater recharge basin within the remainder of the property.

Post-reclamation future land development at the Olive Pit mine site would not occur until mining and reclamation activities are completed, which is planned to happen several decades into the

future. The City recognizes potential effects of future activities and land uses decades in the future require a reasonable degree of forecasting. The City has determined and evaluated the potential environmental impacts of the Proposed Project in this Draft EIR based on best available data and the abilities and limitations of current impact assessment practices. Furthermore, it is recognized that all future post-reclamation phases of development will be subject to subsequent discretionary approvals; and therefore, would be subject to independent review to satisfy requirements of CEQA.

The City of Irwindale and United Rock (applicant/operator) have identified the following list of project objectives for the *Olive Pit Mine and Reclamation Project EIR.*

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 a storm water retention, flood control facility, groundwater recharge basin, and/or open space recreational land uses[1].
- 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

[1] Post-reclamation land use development(s) at the Olive Pit mine site 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.

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.

- *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 Production 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.

The Proposed Project plans involve 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; and 3) site reclamation. The Olive Pit mine site remains inactive and is in the same configuration that existed when mining ceased in the 1970s. Mining activities are again proposed at the site based on existing and projected future demands for aggregate sand, gravel and rock products.

The City’s General Plan land use designation for the Olive Pit is Quarry Overlay (Residential Commercial). The Quarry Overlay applies to areas in the City where current or future resource extraction will take place. The Quarry Overlay designation supports a diverse array of zones

including Commercial, Commercial-Recreation, Residential-Business Park, Industrial-Business Park, and Open Space.

The City's zoning map shows the Olive Pit zoning as Agricultural (A-1). The A-1 zone is not consistent with the General Plan land use designation of the site; and therefore, the Project requires a Consistency Zone Change request to comply with the existing General Plan Quarry Overlay designation. The project proposal includes a request to amend the zoning to Quarry Zone (Q).

The proposed project will add approximately 5-6 employees to the local and regional workforce. It is anticipated that prospective employees will come primarily from underemployed citizens from the City and surrounding communities, and therefore the new employment opportunities are not expected to induce substantial new population growth from outside the region. No new housing or other development is proposed by the Project that could bring substantial numbers of new people or jobs into the region. Therefore, the Proposed Project does not directly remove any barriers to growth, and does not have characteristics that could directly induce growth locally or regionally.

An indirect growth-inducing effect is one that could lead to future growth or remove a barrier to growth. To evaluate the possible indirect effect the Project may have on growth within the City or region, it is important to understand some of the traditional barriers to growth. These may include the following:

- Transportation facilities for the population to travel between their place of employment, recreational facilities, service facilities, shopping, and their homes;
- Educational facilities, including elementary and high school facilities, secondary education facilities, and vocational institutions;
- Employment patterns such as high unemployment or limited employment opportunities within the region;
- Affordable housing to accommodate all income categories;
- Wastewater treatment capacity;
- Quality of emergency services such as police, fire, and medical facilities;
- Availability of electricity; and
- Water supply and distribution.

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 though 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 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.

4.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

This section considers the effects of the Proposed Project that would result in a commitment of resources and uses of the environment that could not be recovered with Project implementation. Public Resources Code Section 21100(b)(2)(B) requires an environmental impact report to include a detailed statement setting forth any significant effects on the environment that would be irreversible if a project is implemented. Consideration of significant irreversible environmental changes per §15126.2(c) of the State CEQA Guidelines includes evaluation of:

> *Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified*.

An irreversible or irretrievable commitment of resources would occur when resources are consumed, committed, or lost as a result of the Proposed Project. The commitment of a resource would be "*irreversible*" if the project started a process (chemical, biological, or physical) that cannot be stopped. As a result, the resource productivity or its utility would be consumed, committed, or lost forever. Commitment of a resource would be considered "*irretrievable*" when the project would directly eliminate the resource, its productivity, or its utility for the life of the project and beyond.

As discussed throughout Chapter 3 of this EIR, the Proposed Project would result in permanent changes to the existing environment involving the re-engagement of mining activities and land reclamation at the existing, currently inactive Olive Pit mine. Mineral extraction activities for the length of operations/reclamation activities are anticipated to extend until the year 2050 or until resource depletion.

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 mine, as they are excavated and subsequently reclaimed.

Post-reclamation land use development(s) at the Olive Pit mine site 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 is limited to potential impacts from the new access road, extraction, and the proposed reclamation plan. Future potential development, which may occur in 35 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 in subsequent environmental review

Re-activation of mining activities at the site would involve the consumption of energy derived from nonrenewable sources for electricity to power on-site equipment and fossil fuels for project-related vehicle trips to the processing yard approximately 3.8 miles away. While these changes would be irreversible, these changes are the result of mining and reclamation of an existing open-pit mine, and the associated long-term land use planning that may benefit the physical environment by implementing the City's adopted land use plans. Project operations will satisfy regional demands for aggregate materials. As such, these changes could constitute a long term benefit to the City through economic development and potential end land uses for a storm water retention area, and/or a ground water recharge basin, and/or open space recreational land uses rather than an open mining pit. Additional project benefits include the extraction of remaining resources that have been designated as a Regionally Significant Construction Aggregate identified as having statewide and regional significance and thereby providing the Los Angeles basin with aggregate materials. For these reasons stated above, the Project would not create a significant irreversible environmental change.

4.3 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Public Resources Code Section 21100(b)(2)(A) requires an EIR to include a detailed statement setting forth any significant effects on the environment that cannot be avoided if a project is implemented. Pursuant to State CEQA Guidelines §15126.2(b), an EIR must:

> *Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the*

reasons why the project is being proposed, notwithstanding their effect, should be described.

Based on the analyses presented in Chapter 3 of this Draft EIR, with the implementation of identified mitigation measures, the Proposed Project would not result in any significant, unavoidable impacts with the exception of an exceedance of the daily emission threshold for NO_x and long term traffic impacts at Azusa Canyon Road / Arrow Highway and I-605 SB Off-Ramp /Arrow Highway. 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.

4.4 ENERGY CONSERVATION

The State CEQA Guidelines §15126.4(A)(1)(C) states: "*Energy conservation measures, as well as other appropriate mitigation measures, shall be discussed when relevant. Examples of energy conservation measures are included in Appendix F*." The CEQA Appendix F *Energy Conservation* recognizes that the goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:

1. Decreasing overall per capita energy consumption,
2. Decreasing reliance on natural gas and oil, and
3. Increasing reliance on renewable energy sources.

The Olive Pit Mine Reclamation Plan is designed to play a role in the recovery of regionally significant 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 identified as having statewide and regional significance. The extraction of all economically recoverable mineral resources from the Olive Pit is intended to provide the Los Angeles Basin with aggregate materials as demand dictates. As stated above, 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.

Project Energy Consumption

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.