

CHAPTER 4.0 – OTHER ENVIRONMENTAL CONSIDERATIONS

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EXHIBITS

N/A

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4.1 INTRODUCTION

CEQA requires consideration and discussion of a range of issues extending beyond analysis of project-specific impacts to individual resource areas. This chapter of the Draft EIR contains analysis of the following additional State CEQA mandated discussions:

- Growth Inducing Effects of the Proposed Project – CEQA Guidelines §15126.2(d);
- Significant Irreversible Environmental Changes – CEQA Guidelines §15126.2(c);
- Cumulative Impacts of the Proposed Project – CEQA Guidelines §15130; and
- Unavoidable Adverse Impacts of the Proposed Project – CEQA Guidelines §15126.2(b).

4.2 GROWTH INDUCING 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 would 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 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, land development is proposed on a specific property to provide an urban recycling and waste management function with regional benefits.

The goals and objectives of the Proposed Project are designed to 1) comply with Assembly Bill 939 (AB939) which requires every city and county in the State to divert at least 50 percent of wastes generated in their jurisdiction from going to a landfill, and 2) provide the regional need of a MRF/TS, as a service facilitator, in compliance with AB 939. Operations at the MRF/TS would consist of sorting, consolidating, compacting received materials, and then re-loading all recyclable, composting, and solid waste material into transfer trucks for transport to additional processing and/or disposal facilities. As a primary function, a MRF/TS reduces the amount of solid waste material which is ultimately disposed of at a landfill.

The vacant site is currently zoned for heavy industrial use and was targeted for commercial land use [now proposed as industrial land use for consistency with the City’s zoning designation] in fulfillment of the City’s stated long-term economic development goals. The City’s Redevelopment Agency owns the parcel, and the project does fulfill City redevelopment objectives. The Proposed Project will add an additional 323 employees to the City and regional workforce. It is anticipated that prospective employees will come primarily from underemployed

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citizens from the City and surrounding communities, and therefore the new employment opportunities are not expected to *induce* substantial *new* population growth.

4.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES AND IRRETRIEVABLE COMMITMENT OF RESOURCES

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 if the Proposed Project were constructed. 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 could not 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.

In addition to the commitment of land to urban uses, implementation of the Proposed Project 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. Building materials could be considered permanently consumed. These changes would be irreversible, but are the result of long-term land use planning, fulfill regional recycling and waste management needs, and benefit the City’s long-term economic development goals and plans. These changes are also not unique to this site, and would occur anywhere a MRF/TS was developed in the region. As such, these changes do not constitute significant adverse impacts.

The primarily function of the MRF/TS is to promote recycling and potential re-use of discarded materials which may otherwise be permanently lost and take up space in a landfill. By receiving, sorting, and promoting the re-use of yard waste, construction & demolition waste, and regular household and commercial waste, a MRF/TS provides a significant environmental benefit in retrieving such materials which would otherwise become essentially irretrievable.

While there will be short-term and long-term consumption of resources including land, cement, fossil fuels, and other building materials for the Proposed Project, these impacts are not considered unique or significant to this site or this Proposed Project.

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4.4 UNAVOIDABLE ADVERSE IMPACTS

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”.

The purpose of this section is to describe the potential for unavoidable adverse impacts from the Proposed Project. Adherence to adopted federal, State, and City regulations, and project-specific mitigation measures as they apply to construction and operation of a MRF/TS have been identified as conditions of approval for the Proposed Project, and will eliminate or minimize the potential for significant adverse impacts. The unavoidable adverse environmental impacts are identified to occur under the following resource topics and are summarized below (refer to the resource chapter for detailed discussion):

Air Quality / Greenhouse Gas / Odor / Health Risk Assessment

Construction activities would emit criteria pollutants in excess of SCAQMD thresholds of significance that would temporarily contribute to existing poor air quality. Construction-related emissions would be short-term, but may still cause adverse effects on air quality. Construction activities include site preparation, earthmoving, and general construction. Site preparation includes activities such as general land clearing and grubbing. Earthmoving activities include cut-and-fill operations, soil compaction, and grading. General construction includes adding improvements such as roadway surfaces, structures, and facilities. Construction activities would emit criteria pollutants in excess of SCAQMD thresholds of significance that would temporarily contribute to existing poor air quality. With mitigation, the estimated maximum daily ROG emissions are significant and unavoidable, while NO_x, CO, PM₁₀, and PM_{2.5} are less than significant.

Operation of the proposed project would generate emissions of criteria pollutants from the transfer trucks, employee vehicles, area sources, and service station that would be above the significance thresholds. Operation of the proposed project would generate emissions of criteria pollutants from the facility trucks, employee vehicles, area sources, and service station that would be above the significance thresholds. With mitigation, operational emissions generated by the Proposed Project would exceed SCAQMD CEQA thresholds for NO_x.

Noise

Traffic-related noise levels would exceed the Federal Interagency Committee on Noise standard, where an increase in noise by 1.5 dBA or more is considered significant for existing noise levels greater than 65 dBA Ldn at existing residences. No feasible mitigation measures have been identified to reduce the project and cumulative noise impacts to the exterior areas of businesses along Live Oak Avenue and the Arrow Highway from traffic activity between the Site and freeways. Therefore, traffic-related noise would be considered a significant impact to exterior locations along the roadway segments between the Proposed Project Site and the freeways on Live Oak Avenue and Arrow Highway.

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4.5 CUMULATIVE PROJECTS

A cumulative project refers to land development projects that are in various phases of entitlement, planning and/or construction and that may affect the same resources and geographic area as the Proposed Project. The City of Irwindale had six [additional] projects pending at the time of the *Irwindale Materials Recovery Facility and Transfer Station* Draft EIR (July 2009). In addition, the surrounding cities were consulted regarding any such projects which may be considered as a cumulative project to the Proposed Project. The City of Azusa had two projects pending as listed in **Table 4-1 Cumulative Projects within the Proposed Project Area** [below]. The cumulative projects table lists the related projects within the area of potential effects for the *Irwindale Materials Recovery Facility and Transfer Station* project. For each cumulative project, information is provided regarding the project name, general location (or street address if available), and summary description of the action proposed.

TABLE 4-1 CUMULATIVE PROJECTS WITHIN THE PROPOSED PROJECT AREA*

Project Name	Location	Summary Description
<i>The City of Irwindale</i>		
KARE Youth League / Fe Dam Sports Park	Santa Northeast corner of Arrow Highway and I-605, Irwindale	Development of a youth sports park to be constructed over a ten-year period. Multiple baseball fields, basketball courts, and soccer fields, all with grandstand seating. Restrooms, Administrative / Retail Building, and Club room / Office Building
Asian Ceramics	2800 Huntington Drive, Irwindale	6,000 square foot building for wholesale ceramic products
Ahern Rentals	13645 Live Oak Lane, Irwindale	Replace existing 23,000 square foot building with 29,000 square foot building
Hotel	15744 Arrow Highway, Irwindale	Proposal for a 120 room hotel
Manufacturing Building	Northeast corner of Azusa Canyon Road and Cypress Street, Irwindale	Proposal for manufacturing building – ~22,000 square foot office, ~454,000 square foot warehouse, and ~150,000 square foot of manufacturing
Convenience Store / Self-Serve Car Wash / Gas Station / Restaurant	5200 Rivergrade Road, Irwindale	Development of a convenience store, self-serve car wash, gas station with nine double-sided pumps, restaurant (drive-through), and potential specialty retail space
<i>The City of Azusa</i>		
Target	Southwest corner of Azusa Avenue and 9 th Street, Azusa	Redevelopment project of a two-story Target retail store and associated improvements on several parcels (Draft EIR stage)

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TABLE 4-1 CUMULATIVE PROJECTS WITHIN THE PROPOSED PROJECT AREA*

Project Name	Location	Summary Description
Azusa Rock Revised Conditional Use Permit and Reclamation Plan	Northerly terminus of Encanto Parkway and Fish Canyon Road	The Revised Conditional Use Permit & Reclamation Plan, upon approval by the City and the State Office of Mining & Reclamation would allow the applicant to modify its operations and reclamation approach.
<i>The City of Covina</i>		
No projects pending		
<i>The City of Baldwin Park</i>		
No projects pending		
<i>The City of Glendora</i>		
No projects pending		
<i>Surrounding Areas</i>		
Build out of the Cities of Duarte, Monrovia, and the Unincorporated section of Los Angeles County known as the Monrovia islands according to their respective General Plans	Cities and County parcels located to the north, south and west of the Proposed Project.	Development of residential, commercial and other land uses that would occur during the projected 7-8 year for Project buildout.

SOURCE: City of Irwindale Planning Department. The cities of Covina, Baldwin Park, and Glendora had no pending project applications based on communication in May 2009.

** It is important to note - the above listed proposed [future] projects are in various phases of entitlement, planning and/or construction. For example, some projects have been approved, some projects are pending approval, and other projects are under construction.*

4.6 CUMULATIVE IMPACT ANALYSIS

Cumulative impacts are those impacts that are individually less than significant but, when considered together with related impacts of other projects in the affected area, could result in a combined effect that is significant. The geographic scope of the area affected by the cumulative effect is based on **Table 4-1 Cumulative Projects within the Proposed Project Area** and/or public agency cumulative thresholds, as applicable. As defined in State CEQA Guidelines §15130 and §15355, a cumulative impact may result from the incremental impact of the project when added to other related past, present, and reasonably foreseeable future development projects.

Furthermore, §15130(b) states that the discussion:

“shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great of detail as is provided for the effects attributable to the project alone. The EIR should be guided by standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.”

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As defined under State CEQA Guideline §15130(b), the following elements are necessary to provide an adequate discussion of potential cumulative impacts.

1. Either:
 - (a) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or
 - (b) A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.
2. When utilizing a list, factors to consider when determining whether to include a related project should include the nature of each environmental resource being examined, the location of the project, and its type;
3. Lead agencies should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limits used;
4. A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available; and,
5. A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects.

4.6.1 Aesthetics

Implementation of the Proposed Project would have a negligible effect on the aesthetic character of the local area because it would involve the development of a vacant lot in an industrial/commercial area with an industrial use that would be compatible with surrounding uses. New sources of lighting that would be needed for the Proposed Project would be designed in keeping with surrounding uses and thus would not significantly contribute to cumulative light and glare effects in the City. The related cumulative projects may change the aesthetic character of the area since new structures are proposed. These projects are also subject to project-specific CEQA review and are required to be in compliance with city development, lighting, and landscaping standards. Therefore, by incorporating standard mitigation measures and local regulatory requirements, the Proposed Project in combination with the cumulative projects would have less than significant cumulative effects on visual resources.

4.6.2 Air Quality / Greenhouse Gas / Odor / Health Risk Assessment

Cumulative emissions thresholds established by the SCAQMD are the same as project-specific thresholds. Thus, if project emissions fall within the regional emission limits established by SCAQMD for construction and operations, the district considers that the project would not contribute to a cumulatively considerable impact. The project would be considered to have both project-specific and cumulatively considerable impacts on regional air quality if the project's

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mitigated emissions exceed the district's project-specific thresholds for either construction or operation.

The Proposed Project would result in a significant NO_x impact during operations. Therefore, the Proposed Project would result in a regional cumulative operations impact given that the South Coast Basin is in nonattainment for ozone and the Proposed Project would exceed the regional daily emissions threshold for NO_x, an ozone precursor. The incremental GHG emissions from this Proposed Project would have a cumulatively considerable contribution to State GHG emission reduction goals, although design characteristics and mitigation measures are intended to reduce the overall impact.

4.6.3 Environmental Safety

The Proposed Project has positive public health and safety effects by routing recyclable materials from the surrounding communities for re-use or concentrated transport to landfills in the Southern California region. The MRF/TS may occasionally receive small amounts of illegally disposed of HHW and other waste streams. In accordance with strict State laws and regulations, these materials will be securely stored for short-terms, and regularly removed from the site by a licensed contract vendor for proper disposal.

Potential risks associated with the use of hazardous materials (primarily fuels, equipment lubricants, and cleaning solvents) would be properly mitigated during the construction phase of each cumulative project by requiring the use of BMPs and adhering to environmental laws and regulations for their use, handling, and disposal. Construction and operation of the Proposed Project and other reasonably foreseeable future projects in the vicinity could result in the exposure of workers or the public to hazardous materials due to the unintentional release or spill of hazardous materials. These impacts would be reduced to a less than significant level through compliance with local, State, and federal regulations and the implementation of mitigation measures.

Other cumulative projects will be required to implement hazardous materials BMPs and therefore should not result in significant cumulative hazards and hazardous materials effects. Therefore, the Proposed Project in combination with cumulative projects would result in less than significant cumulative risks due to hazards and hazardous materials.

4.6.4 Water Quality and Soils

Development at the site and other projects in the vicinity of the Proposed Project may result in similar impacts relative to water quality and soils, but each project's impacts are independent of one another and are mitigated on a site-specific basis. Further, while water quality impacts have the ability to compound when taking into account regional water basins into consideration, the Proposed Project as conditioned will require the Application to adhere to the mandatory State and local laws, ordinances, regulations, and water quality standards (which do not represent added mitigation measures but are required for all MRF/TS projects). Regional geologic impacts do not generally compound, and are limited to the site at which they occur.

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The Proposed Project, when considered with other projects in the same watershed, may result in cumulative impacts to surface and groundwater quality from increased surface impermeability and resultant runoff. Construction projects could result in increased erosion from exposed soil areas, which could contribute sediments into local drainage courses and other waterways. However, it is reasonably assumed that new construction associated with future projects will be required to meet federal, State, and local construction and operation standards at least as rigorous as those required at present. Therefore, the potential for cumulative impacts to water quality and soils is deemed to be less than significant.

4.6.5 Land Use Compatibility

The Proposed Project site is zoned Heavy Manufacturing (M-2), with a General Plan land use designation for commercial development. The Proposed Project site is vacant and located in an existing industrial/manufacturing and commercial area, and is south of the USACE's flood control basin and recreation area; and, is therefore compatible with surrounding land uses. The Proposed Project includes a General Plan Amendment and Zoning Code Amendment to allow the land use designation to be consistent with the existing zoning and to allow for the MRF/TS at the site.

Implementation of mitigation measures identified for specific project actions on a case-by-case basis would also reduce potentially significant cumulative impacts to a less than significant level. Project-specific land use incompatibilities would be addressed in the individual project's CEQA review and implementation of mitigation measures.

In addition, because the post-development land use will be consistent with the City's long-term goals and adopted land use plans, implementation of the Proposed Project in consideration of the cumulative projects would not have a significant cumulative impact on the surrounding area in terms of land use compatibility.

4.6.6 Environmental Justice

CEQA does not have an Environmental Justice analytical requirement. However, Environmental Justice is a defined term in California statute. Specifically, California Government Code Section 65040.12 defines Environmental Justice as "the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations and policies".

The Proposed Project will not result in a disproportionate effect on minority populations, low income populations or Native Americans, nor does the Project pose any issues relative to environmental justice. Therefore, implementation of the Proposed Project, and in consideration of the cumulative projects, would not have a significant cumulative impact on environmental justice.

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4.6.7 Noise

Land development at the Proposed Project site will not significantly increase or otherwise modify the noise level experienced by nearby receptors. Cumulative noise impacts would generally be limited to impacts within the immediate vicinity of the project area. Noise levels associated with construction-related noise levels would exceed the 75 dB City of Irwindale construction noise standard at the property boundary (Irwindale Municipal Code Section 9.28.110). Existing background noise levels near the property boundary range from 40 to 58 dBA. Therefore, construction-related noise levels would be considered a potentially significant impact; as such, mitigation measures have been developed to minimize these noise impacts. Implementation of the required mitigation measures would result in less than significant construction noise impacts.

The ambient noise levels from the Proposed Project would not exceed the ambient base level for industrial land uses by more than five (5) dBA at the property boundary line during day or night time as stated in Irwindale Municipal Code Section 9.28.120. When taken into consideration of the cumulative project list, this may represent a significant noise impact; however consideration of the cumulative project locations is necessary in determining the severity of noise impacts, as well as, the existing industrial land uses to the south of the Proposed Project site.

The cumulative impact of traffic noise is demonstrated by the net change future plus project buildout vs. existing scenario. The following segments have significant cumulative noise impacts and the project contribution is cumulatively considerable:

- Arrow Highway, west of Rivergrade Road,
- Live Oak Avenue, west of Stewart Avenue, and
- Arrow Highway, north of Live Oak Avenue

The segment of Baldwin Park Boulevard south of Live Oak Avenue, shows a significant cumulative impact but the project contribution is less than significant.

4.6.8 Public Services and Utilities

The Proposed Project would not result in substantial demands for additional fire, police, schools, parks, or library services and therefore would not incrementally contribute to potential cumulative impacts to local public services.

Although the cumulative projects would increase the need for utilities and service systems, these impacts have been, or would be analyzed in each project's environmental documents and each project would contribute an appropriate share to meet the projected demand for future utilities and service systems. Increased demands for public services resulting from development of the cumulative projects would be assessed in each project's CEQA review. Utility requirements would be assessed by the City during each project's CEQA review and may require infrastructure improvements or impact fees as part of the project approval. The Proposed Project in combination with cumulative projects would result in less than significant cumulative impacts to public services and utilities.

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4.6.9 Traffic Generation & Circulation

The cumulative projects could increase the need for local and regional circulation improvements; as such, project-specific impacts would determine an appropriate share to meet the projected demand for future circulation needs and systems. For Interim Year (2011) Without Project conditions, an ambient growth rate of 2.0% per year (consistent with City of Irwindale traffic study guidelines) was applied to the Existing (2009) for one year in addition to the cumulative project / other development data provided by City of Irwindale staff. Other cumulative development has been obtained from the City of Irwindale and other nearby cities and is presented in **Table 4-1 Cumulative Projects Within the Proposed Project Area**. The other cumulative development projects are anticipated to generate 12,102 daily trips with 566 trips during the AM peak hour and 1,227 trips during the PM peak hour.

The Los Angeles County CMP defines a general growth factor of 1.197 to reflect a growth of 20 years. Appendix “I” of the Traffic Impact Analysis contains the relevant excerpts from the Los Angeles County CMP traffic impact analysis guidelines. For 2018 Without Project conditions, an ambient growth rate of 2.0% per year (consistent with City of Irwindale’s *Traffic Study Guidelines*) was applied to the Existing (2009) for nine years in addition to the cumulative project / other development data provided by City of Irwindale staff (also provided in Appendix “H” of the Traffic Impact Analysis). Based on the City of Irwindale’s ambient growth rate direction and nine year duration, the resulting growth factor is 1.20. As illustrated, the Los Angeles County CMP growth factor for 20 years is less than the resulting growth rate (1.20) calculated based on City of Irwindale requirements. Therefore, the 2018 analysis has been considered equivalent to the evaluation of Long Range Horizon Year conditions for CMP analysis purposes.

4.7 CONCLUSIONS

With implementation of the required mitigation measures included in this Draft EIR and summarized in **Chapter 6.0 Mitigation Summary**, resource impacts associated with the Proposed Project would be less than significant, with the exception of traffic noise and cumulative air quality impacts from operational activities. This assessment is based on the fact that South Coast Basin is in nonattainment for ozone; and therefore, the Proposed Project would exceed the regional daily emissions threshold for NO_x, an ozone precursor. The incremental GHG emissions from this Proposed Project would have a cumulatively considerable contribution to State GHG reduction goals, although design characteristic and mitigation measures are intended reduce the contribution to the overall impact.