

5.0 ADDITIONAL TOPICS REQUIRED BY CEQA

Section 15126 of the *CEQA Guidelines* requires that all aspects of a project must be considered when evaluating its impacts on the environment, including planning, acquisition, development, and operation. As part of this analysis, the EIR must also identify (1) significant environmental effects of the proposed project, (2) significant environmental effects that cannot be avoided if the proposed project is implemented, (3) significant irreversible environmental changes that would result from implementation of the proposed project, (4) growth inducing impact of the proposed project, (5) mitigation measures proposed to minimize significant effects, and (6) alternatives to the proposed project.

This section provides a discussion of other CEQA-mandated topics including significant unavoidable impacts, growth inducement, and significant irreversible environmental changes that would result from implementation of the proposed project. Chapter 4.0 of this EIR describes the significant environmental effects of the proposed project and provides mitigation measures proposed to minimize significant effects and Chapter 6.0 discusses alternatives to the proposed project.

5.1 UNAVOIDABLE SIGNIFICANT ENVIRONMENTAL EFFECTS

Section 15126.2 (b) of the *CEQA Guidelines* requires a description of the significant environmental effects which cannot be avoided if the proposed project is implemented. Table 5.A indicates significant unavoidable impacts anticipated to result from the proposed project, even with implementation of the project-specific mitigation measures identified in Chapter 4.0.

Table 5.A – Significant Environmental Effects Which Cannot Be Avoided

Topic	Type of Impact	Impact
Aesthetics	Scenic Vistas	The existing visual character of the new mining sites would be altered during mining and processing. The expansion of the mining areas would remove the existing native plants and create large open pits. This increase in total area mined by both Cemex and Robertson's would result in additional disturbed lands, resulting in significant and unavoidable aesthetic impact.
Air Quality	Long-term Regional Emissions	Impacts from on-site mining operations associated with NO _x emissions would remain significant and unavoidable.
Air Quality	Sensitive Receptors	Impacts from on-site mining operations associated with PM ₁₀ and PM _{2.5} levels would remain significant and unavoidable.
Biological Resources	Take of or Modification of the Habitats of Listed Species or Other Special Status Species	Relocation of the District's Observation Well No. 4 and construction of future water conservation facilities will result in significant and unavoidable impacts to listed species and/or other special status species or modification of their habitats. The proposed aggregate mining expansion will result in significant and unavoidable impacts to listed species and/or other special status species or modification of their habitats.
Biological Resources	Adversely Affect Federally Protected Wetlands, Riparian Areas or Other Sensitive Natural Communities	Relocation of the District's Observation Well No. 4 and construction of future water conservation will result in significant and unavoidable impacts to a sensitive natural community (Riversidean alluvial fan sage scrub). The proposed aggregate mining expansion will result in significant and unavoidable impacts to a sensitive natural community (Riversidean alluvial fan sage scrub).

Table 5.A – Significant Environmental Effects Which Cannot Be Avoided

Topic	Type of Impact	Impact
Biological Resources	Listed Species or Other Special Status Species	Impacts to listed species (slender-horned spineflower, Santa Ana River woollystar, San Bernardino kangaroo rat, and coastal California gnatcatcher) and the Los Angeles pocket mouse will remain significant and unavoidable.
<u>Mineral Resources</u>	<u>Cumulative Loss of Statewide or Regional Mineral Resources Impact</u>	<u>Measured against existing baseline of actual and permitted mining operations, the project does not reduce aggregate mining, but instead expands it. On a cumulative basis, however, the project involves designation of areas containing potentially significant aggregate reserves and reserves them to non-mining uses. This impact, combined with potential development of other projects inside the San Bernardino production-consumption region, may result in a cumulative loss of availability of mineral resources. Therefore, the project, in conjunction with other identified cumulative projects, would have a cumulatively significant impact on the availability of mineral resources.</u>
Transportation and Traffic	Opening Year 2008 Freeway Segments Traffic and Level of Service Impacts	Freeway improvements would reduce significant impacts to a less than significant level; however, improvements to the freeway segments are under the authority of Caltrans. There is no mechanism for development project proponents to pay fees or make fair-share contributions toward improving mainline freeway lanes. Consequently, there are no feasible mitigation measures for these impacts. Because there are no feasible mitigation measures for these impacts, cumulative freeway segment LOS impacts remain significant and unavoidable.
Transportation and Traffic	Year 2030 Freeway Segments Traffic and Level of Service Impacts	Freeway improvements would reduce significant impacts to a less than significant level; however, improvements to the freeway segments are under the authority of Caltrans. There is no mechanism for development project proponents to pay fees or make fair-share contributions toward improving mainline freeway lanes. Consequently, there are no feasible mitigation measures for these impacts. Because there are no feasible mitigation measures for these impacts, cumulative freeway segment LOS impacts remain significant and unavoidable.

5.2 SIGNIFICANT IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

In accordance with Section 21067 of the California Environmental Quality Act (CEQA), and with Section 15040, 15081, and 15082 of the *State CEQA Guidelines*, this section identifies impacts that could not be eliminated or reduced to an insignificant level by mitigation measures included as part of the proposed project, or by other mitigation measures that could be implemented, as described in Section 4.0 of this EIR.

The *CEQA Guidelines*, Section 15126.2(c), mandate that an EIR must address any significant irreversible environmental changes that would be involved in the proposed action, should it be implemented. An impact would fall into this category if:

- The project would involve a commitment of nonrenewable resources (e.g., mining and biological resources);
- The primary and secondary impacts of the project would generally commit future generations to similar uses;
- The project involves uses in which irreversible damage could result from any potential environmental incidents associated with the project; and/or

- The proposed consumption of resources is not justified (e.g., the project results in wasteful use of energy).

Determining whether the proposed project may result in significant irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them.

Implementation of the Upper Santa Ana River Wash Land Management Plan would permit, after approval of Conditional Use Permits/Reclamation Plans, the expansion of two aggregate mining operations in the Planning Area. The proposed mining activities would include the deepening of existing quarries and the creation of new quarries. Most of the areas to be mined in the proposed project have already been disturbed; however, some mining is proposed on undeveloped open space located in an area east of Orange Street. The proposed project entails the mining of aggregate materials until 2065 with reclamation completing by 2070. Under the proposed project, aggregate resources totaling 6 million tons per year (MTPY) could be mined.

Development under the proposed project would potentially reduce the amount of aggregate resources on the Planning Area by 1.5 MTPY compared with the existing level of production. The reduction in aggregate resources would represent a significant loss of a nonrenewable resource; however, the mining permits for both operations would have a finite date for terminating mining operations and the loss of aggregate resources would not be considered a permanent commitment of the site to mining operations. As discussed in various sections of Chapter 4.0, consumption of aggregate resources is justified and, furthermore, the aggregate supply and production is proposed to be managed over time, along with other resource-based uses on-site. As stated in Section 4.10, aggregate products are used in almost all building construction and in most public works projects such as roadways, bridges, dams, water and sewer facilities, airports, and in the maintenance of these structures and facilities. In addition, although the maximum amount of aggregate resources mined per year is established under the proposed project, the actual amount that is mined could be less as production depends on demand, which varies with the economy.

As addressed in Chapter 4.0, implementation of the Planning Area would result in potentially significant impacts related to aesthetics, air quality, biological resources, cultural resources, water quality, hazards, noise, transportation, recreation, and utilities. Mitigation measures have been identified to reduce the significance of potential impacts to less than significant levels for the rest of the aforementioned environmental topics, except for aesthetics, air quality, biological resources, and transportation. Impacts to biological resources would result in a loss of habitat; therefore, lands converted from habitat to another use would be an irretrievable and irreversible commitment of natural resources. Transportation impacts apply to intersection and freeway segment improvements and are not involved with the irreversible and irretrievable commitment of resources.

Although implementation of an HCP is expected to minimize the direct impacts to listed species (loss of individuals), there would remain a loss of habitat area available for recovery of these species. The remaining habitat would be subject to continued fragmentation and disturbance due to implementation of project activities. This loss of habitat would be an irreversible and irretrievable commitment of land to another use.

5.3 GROWTH INDUCEMENT

CEQA requires a discussion of the ways in which the proposed project could be growth inducing. Section 15126.2(d) of the *CEQA Guidelines* identifies a project as growth inducing if it fosters economic or population growth, or the construction of additional housing, either directly or indirectly in the surrounding environment. New employees from commercial and industrial development and new population from residential development represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area.

A project could indirectly induce growth by reducing or removing barriers to growth, or by creating a condition that attracts additional population or new economic activity; however, a project's potential to induce growth does not automatically result in growth. Examples of development which would indirectly facilitate growth include projects that provide infrastructure or service capacity to accommodate growth beyond the levels currently permitted by local or regional plans and policies (e.g., installation of new roadways or the construction or expansion of water delivery/treatment facilities). Growth can only happen through capital investment in new economic opportunities by the private or public sectors. Pursuant to CEQA, growth inducement is not considered necessarily detrimental, beneficial, or of little significance to the environment.

The continued land uses in the proposed project do not include any uses that would permit habitable structures; therefore, there would be no growth in population directly due to implementation of the proposed project. With no population growth anticipated to occur as a result of the project, it is consistent with growth projections contained in SCAG's *Regional Comprehensive Plan and Guide*.¹

Aggregate mining land uses would increase to approximately 1,195 acres of land within the Planning Area; however, no expansion of plant facilities for mining operations would occur. As stated previously, the Planning Area is located in a region that has experienced considerable population growth during the past two decades, with growth expected to continue through the next decade.

The availability of aggregate for concrete, asphalt, and other building materials to construct new buildings, homes, and infrastructure at a competitive price is a key element of the local economy. The Planning Area has extensive natural sand and gravel resources for highway and building construction necessary to support the expanding economy of the Inland Empire. In 1987, the State of California Department of Conservation, Division of Mines and Geology (CDMG Special Report 143, 1987) identified the high quantity and quality of aggregate resources in the Planning Area as one of the best aggregate deposits in the State. It was also noted that adjacent regions in Orange, Los Angeles, and Riverside Counties had lesser reserves and would likely need to import aggregates from the San Bernardino Valley to meet their local needs, adding to the extended regional importance of aggregate resources in the Inland Empire. According to the report "Aggregate Availability in California" (Department of Conservation, California Geological Society, 2006), the San Bernardino production-consumption region has permitted aggregate reserves of 262 million tons as compared to the 50-year demand of 1,148 million tons. This equates to a 12-year supply of permitted aggregate reserves or only 24 percent of the estimated 50-year demand. This demand is based on population forecast data prepared by the California Department of Finance using U.S. Census data.

It is State policy that when a designation of statewide or regional significance is made within its jurisdiction, a local community shall establish mineral resources management policies to be incorporated in general plans to assist in management of land use, and emphasize the conservation and development of those identified mineral deposits (SMARA Note 26, Article 4, Revised 1/97). In other words, it is State policy to protect the availability of those resources needed to support economic development in the region. Currently, aggregate materials in the Planning Area are near the expanding markets of the Inland Empire, which reduces the transportation cost of the raw aggregate and end products of ready-mix concrete and asphalt, which affects construction costs. The need to provide areas within the Planning Area for the availability of aggregate reserves to meet the expected demand is vital to the local and regional economy.

The expansion of the aggregate mining area of the Planning Area is in direct response to the demand for aggregate products created by present population growth in the region. The proposed project would not induce significant population growth; it is, rather, addressing population growth. As with most cities within the region, population is expected to grow rapidly, thus prompting the need for additional housing to support the growth.

¹ Southern California Association of Governments, *Regional Comprehensive Plan and Guide*, adopted June, 1994.

The SCAG's most recently adopted population, housing and employment growth forecasts for the Cities of Highland and Redlands, and the U.S. Census Bureau's 2000 Census data for the Community of Mentone are indicated in Table 5.B. Figures for the Community of Mentone were obtained by extrapolating data based on year 2000 Census figures.

Table 5.B – Population, Housing and Employment Forecasts

	2005	2010	2025
Population			
Highland	48,458	50,167	63,229
Redlands	69,288	72,036	84,875
Community of Mentone	8,512	9,220	11,346
SANBAG	1,919,215	2,059,420	2,558,729
SCAG	18,117,604	19,208,661	22,035,416
Households			
Highland	14,187	15,111	20,289
Redlands	24,857	26,419	34,642
Community of Mentone	3,116	3,444	4,629
SANBAG	567,172	618,782	826,669
SCAG	5,673,585	6,072,578	7,263,519
Employment			
Highland	7,716	10,171	15,471
Redlands	27,124	29,777	43,921
Community of Mentone	4,230	5,030	6,464
SANBAG	669,028	770,877	1,074,861
SCAG	7,764,997	8,729,192	10,100,776

Source: Southern California Association of Governments, *Growth Forecasting: City Projections*, <http://www.scag.ca.gov/forecast/downloads/2004GF.xls>, 2004. U.S. Census Bureau, *Census 2000 Summary File 1*, Community of Mentone, accessed February, 22 2007.

The jobs-to-housing ratio measures the extent to which job opportunities in a given geographic area are sufficient to meet the employment needs of area residents. This ratio identifies the number of jobs available in a given region compared to the number of housing units in the same region. For example, a region with a jobs-to-housing factor of 1.5 would indicate that 1.5 jobs exist for every housing unit within the region. The standard used for comparison is the jobs-to-housing ratio of the southern California region, since most residents of the region are employed somewhere in the region. A sub-area of the region with a jobs-to-housing ratio lower than the overall standard would be considered a “jobs poor” area, indicating that many of the residents must commute to places of employment outside of the sub-area. Current and potential jobs-to-housing ratios for the region are indicated in Table 5.C.

The current average jobs-to-housing ratio for the southern California region is 1.37. SANBAG, a sub-region, currently has a jobs-to-housing ratio of 1.18. The Community of Mentone, City of Redlands, and City of Highland are currently below the standard for the southern California region. The projected future jobs-to-housing ratio for the southern California region is 1.40. The projected future jobs-to-housing ratio for the SANBAG sub-region is 1.30. The Community of Mentone is the only location that meets the future jobs-to-housing ratio standard. The Cities of Highland and Redlands would be considered “jobs-poor” areas in the future.

The proposed project would not involve a significant number of new employment opportunities. As a result, the project would have no contribution to improving the jobs-to-housing ratio for the region.

Table 5.C – Current and Future Jobs/Housing Ratios

	Current (2005)* Jobs/Housing Ratio	Potential (2025) Jobs/Housing Ratio
Highland	0.54	0.76
Redlands	1.09	1.27
Community of Mentone	1.36	1.40
SANBAG	1.18	1.30
SCAG	1.37	1.40

* Using the SCAG's most recently adopted forecasts, the housing and employment estimates for 2005 are the closest to the current year that the SCAG provides information for; therefore, the 2005 estimates are used to calculate the current jobs-to-housing ratio.

Source: Southern California Association of Governments, *Growth Forecasting: City Projections*, <http://www.scag.ca.gov/forecast/downloads/2004GF.xls>, 2004. U.S. Census Bureau, *Census 2000 Summary File 1*, Community of Mentone, accessed February, 22 2007.

The proposed project includes the setting aside of rights-of-way for two streets within the City of Redlands (Alabama Street and Orange Street) and for the reconfiguration of Greenspot Road and new Greenspot Road bridge in the City of Highland. The setting aside of rights-of-way for the streets is included as part of the Land Management Plan to accommodate an existing need as determined by the General Plans of both cities and to improve the circulation system in both cities. The proposed project would not generate traffic volumes that would require the widening of Alabama Street and Orange Streets in order for the projects to operate. The proposed project includes the construction of a new on-site access road to service mining operations. This new access road will be used exclusively by the mining companies and will not have public access. In addition, as part of the Reclamation Plan required under the SMARA, all mining infrastructure improvements must be removed once the mining operations cease. Therefore, the proposed project will not induce growth due to the extension of infrastructure.

5.4 CONSISTENCY WITH REGIONAL PLANS

CEQA *Guidelines*, Section 15125(d), requires that any inconsistencies between a regionally significant project and regional plans be discussed in an EIR. Consistency with the *Air Quality Management Plan* is addressed in Section 4.3 of this EIR. Consistency with the *Regional Transportation Plan* is addressed in Section 4.15. In addition, the *Regional Comprehensive Plan* administered by the SCAG shall be addressed herein.

In response to the NOP/NOI for this EIR/EIS, the SCAG identified several policies from the Regional Comprehensive Plan that may be applicable to the locally preferred project (letter from Jeffrey Smith dated June 2, 2004 located within the Scoping Report prepared by LSA Associates, Inc.). After reviewing the SCAG policies, it was determined that the proposed project is either consistent with the SCAG's identified policies or the policies are not applicable. A brief discussion of the consistency of the proposed project with the SCAG's identified policies follows.

5.4.1 Regional Comprehensive Planning Policies

Growth Management Chapter (GMC) Policies

3.01 *The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies shall be used by SCAG in all phases of implementation and review.*

Discussion: This policy applies to the SCAG's review. The policy is not applicable to the proposed project.

3.03 *The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the regions' growth policies.*

Discussion: This policy affects SCAG directly. The policy is not applicable to the proposed project.

3.09 *Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.*

Discussion: The proposed project includes the setting aside of rights-of-way for two streets within the City of Redlands (Alabama Street and Orange Street) and for the reconfiguration of Greenspot Road and new Greenspot Road bridge in the City of Highland. Both local jurisdictions may seek to minimize the cost of the environmental review for the construction of these roadways by tiering based on reports previously prepared and certified at the time the projects are subject to environmental review.

3.10 *Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.*

Discussion: The proposed project has involved the collaborative efforts of two local jurisdictions and two mining companies plus local, State and Federal agencies in a planning process which will expedite the permitting process for the mining companies and maintain the economic vitality and competitiveness for both the mining companies and cities. Through a planning process built upon consensus, the agreements reached by both the agencies and the private users will assist in expediting the process.

3.20 *Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.*

Discussion: The proposed project is a land use management and conceptual habitat conservation plan that specifically define land use areas for groundwater recharge, aggregate mining and habitat conservation and endangered plants and animals and thereby protect these vital resources. The Planning Area is rich in aggregate resources, is an ideal water recharge area, and contains endangered plants and animals. The proposed project provides for the preservation of all of these resources.

3.21 *Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*

Discussion: The Planning Area has been the location of several cultural and archaeological resource surveys. Impacts to cultural and archaeological resources are identified in Section 4.5 of the EIR. Measures which reduce the impacts of the proposed project to a less than significant level have been identified to mitigate potential impacts.

3.22 *Discourage development or encourage the use of special design requirements in areas with steep slopes, high fire, flood, and seismic hazards.*

Discussion: The proposed project is not located in an area with steep slopes; however, the mining process does create steep slopes. The reclamation plans for the proposed new quarries under the proposed project address the steepness of the slopes with most of the slopes constructed at a ratio of 2H:1V. The Silt Pond Quarry would be the only quarry with a slope of 1H:1V, which will be protected from public access through fencing and signs. In addition, three-strand wire fencing and locked gates in accessible areas will block public access onto the property, much of which is located in isolated, inaccessible portions of the wash. The perimeter of the quarries where it is potentially accessible to the public will be fenced with warning signs posted every 300 feet to restrict public access. While the proposed project would increase the amount and extent of slopes potentially vulnerable to slope

failure, an adequate factor of safety for quarried and reclaimed slopes has been demonstrated (as established in the Mine and Reclamation Plans) and, therefore, no significant slope instability hazard is anticipated to occur.

The proposed project is located in the flood pattern of the Santa Ana River, Mill Creek, and City Creek. The development of structures is not proposed within these flood zones. The proposed project identifies flood areas as part of the land management plan.

The site of the proposed project is within a seismically active region between two major fault systems. As identified in Section 4.6, adherence to City and State standards, as well as the recommendations included in any subsequent project-specific geotechnical investigation, will reduce potential impacts to a less than significant level.

3.23 *Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.*

Discussion: Section 4.11 of the EIR addresses noise impacts and mitigation measures to reduce potential nuisance noise to a less than significant level for the proposed project. The Biological Resources Mitigation Measures included as part of the proposed project preserves and protects biological and ecological resources in a designated area of the Planning Area to mitigate disturbances to these resources in other areas of the proposed project. As previously stated, potential geologic/slope stability impacts have been reduced to a less than significant level for the proposed project. Adequate emergency access to the Planning Area is provided by Alabama Street, Orange Street, Greenspot Road, and State Route 30 for the proposed project.

3.27 *Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective service such as: Public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.*

Discussion: The proposed project does not provide for any dwelling units that would generate a population requiring public education, health care, social services, recreation, law enforcement, and fire protection. The proposed project provides for the construction of trails, which would be accessible equally to all members of society. In addition, at closure of the quarries, the end use of the Silt Pond Quarry may be recreational uses under the proposed project. Potential impacts in relation to Policy 3.27 are less than significant.

Regional Transportation Plan Policies

4.01 *Transportation investments shall be based on SCAG's adopted Regional Performance Indicators:*

Mobility – Transportation Systems should meet the public need for improved access, and for safe, comfortable, convenient, faster and economical movements of people and goods.

- *Average Work Trip Travel Time in Minutes – 25 minutes (Auto)*
- *P.M. Peak Freeway Travel Speed – 45 minutes (Transit)*
- *P.M. Peak Non-Freeway Travel Speed*
- *Percentage of P.M. Peak Travel in Delay (Freeway)*
- *Percentage of P.M. Peak Travel in Delay (Non-Freeway)*

Accessibility – Transportation system should ensure the ease with which opportunities are reached. Transportation and land use measures should be employed to ensure minimal time and cost.

- *Work Opportunities within 45 minutes door-to-door travel time (Mode Neutral)*
- *Average transit access time*

Environment – Transportation system should sustain development and preservation of the existing system and the environment. (All Trips)

- *CO, ROG, NO_x, PM₁₀, PM_{2.5} – Meet the applicable SIP Emission Budget and the Transportation Conformity requirements.*

Reliability – Transportation system should have reasonable and dependable levels of service by mode. (All Trips)

- *Transit – 63 percent*
- *Highway – 76 percent*

Safety – Transportation systems should provide minimal accident, death and injury (All Trips)

- *Fatalities Per Million Passenger Miles – 0*
- *Injury Accidents – 0*

Equity/Environmental Justice – The benefits of transportation investments should be equitably distributed among all ethnic, age and income groups. (All Trips)

- *By Income Groups Share of Net Benefits – Equitable Distribution of Benefits among all Income Quintiles.*

Cost-Effectiveness – Maximize return on transportation investment (All Trips). Air Quality, Mobility, Accessibility and Safety.

- *Return on Total Investment – Optimize return on Transportation Investments*

Discussion: The proposed project includes plans for construction of a new access road connecting the mining sites to 5th Street west of State Route 30. As identified in Section 4.15 (Transportation and Traffic), the new means of access would eliminate truck traffic at a heavily congested intersection (5th Street/Palm Avenue), thus improving LOS standards at that location and others in the vicinity. As the project includes a self-mitigating element, it is consistent with RTP policies aimed at improving mobility, accessibility, reliability, and safety.

As discussed in Section 4.15, the proposed project would be required to adhere to policies set forth in the SCAQMD's AQMP. Air pollution from stationary sources within the Cities of Highland and Redlands is regulated by the SCAQMD. The proposed uses are permitted with the Planning Area's current designations; therefore, the proposed uses of the Planning Area have been included in growth projections for the Cities of Highland and Redlands, which were subsequently used as input in development of the approved AQMP. Furthermore, the proposed project includes the development of an interconnecting trails system throughout the Planning Area that would encourage alternative transportation such as bicycles, thus remaining consistent with RTP policies related to environment and cost-effectiveness. As the proposed project encourages alternative transportation, benefits achieved from implementation of the proposed project would apply to all individuals, thus remaining consistent with the RTP policies related to equity.

4.02 Transportation investments shall mitigate environmental impacts to an acceptable level.

Discussion: Mitigation proposed for transportation impacts are identified in Section 4.15.

4.03 Transportation Control Measures shall be a priority.

Discussion: Transportation Control Measures are identified in Section 4.15.

4.16 *Maintaining and operating the existing transportation system will be a priority over expanding capacity.*

Discussion: The proposed project includes the setting aside of rights-of-way for Alabama Street and Orange Street and for the reconfiguration of Greenspot Road. The proposed project only includes the setting aside of these rights-of-way to dedicate lands for future expansion to accommodate projected population growth. The physical roadway widening activities would occur in the future as their own separate projects, at which time a separate environmental analysis will be conducted. As stated previously, the proposed project includes a new means of access for truck traffic entering and leaving the Planning Area. The new means of access will eliminate truck traffic at the 5th Street/Palm Avenue intersection, thus improving the LOS at this location and others in the vicinity. The end result would be an improved circulation system at the State Route 30 ramp intersection areas, thus maintaining and operating the existing transportation system, without expanding capacity.

Air Quality Chapter Policies

5.07 *Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community-based shuttle services, provision of demand management-based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulations can be assessed.*

Discussion: This policy affects the SCAG directly. The policy is not applicable to the proposed project.

5.11 *Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, sub-regional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.*

Discussion: Consistency with the regional AQMP is addressed in Section 4.3 of this EIR. An air quality impact assessment is contained in Section 4.3 of this EIR.

Water Quality Chapter Recommendations and Policy Options

11.07 *Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.*

Discussion: Reclaimed water is not available for use by the proposed project and reclaimed water is not appropriate as the proposed project does not generate new residences or commercial uses. The mining activities do require water for their operations and about half of the water used is part of the “fine” material placed in silt ponds where it eventually percolates back into the water basin underlying the Planning Area (see Water Analysis in Section 4.8).

Regional Growth Visioning

Regional Growth Principles

- *Principle 1: Improve mobility for all residents;*
- *Principle 2: Foster livability in all communities; and*
- *Principle 3: Enable prosperity for all people.*

Discussion: These principles generally pertain to residential developments or other developments which increase the population of an area. The proposed project does not add residents or increase the population of the area; however, it does include the setting aside of rights-of-way, which would

improve mobility for the existing residents of the surrounding cities and communities in the future. Additionally, the proposed project includes a recreation element that provides for a cohesive trails system connecting the local jurisdictions to the Santa Ana River Trail, thus improving pedestrian and bicycle mobility. The mining of aggregate resources under the proposed project improves the livability in all communities by providing a nearby source for aggregate materials necessary for the building of new structures and infrastructure.

- *Principle 4: Promote sustainability for future generations.*

Discussion: The proposed project preserves an environmentally sensitive area by establishing Habitat Conservation areas and designated water conservation areas. The proposed project also promotes sustainability by providing aggregate resources for future development of communities or reconstruction of existing communities. Recreation areas for future generations are retained by the proposed project through planning for recreation as an end use after closure of the Silt Pond Quarry.

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