
VI. GENERAL IMPACT CATEGORIES

A. SUMMARY OF SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the *CEQA Guidelines* requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(b) states:

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

Based on the analysis contained in this Draft EIR, implementation of the proposed project would result in significant unavoidable project-specific impacts related to: aesthetics (scenic vistas, visual character), air quality (operational emissions and inconsistency with the Clean Air Plan), land use (conflict with applicable plans, land use incompatibility), traffic (access for neighboring residential land uses) and noise (from barge unloading facility, asphalt plant, recycling facility and operation of all equipment simultaneously). The proposed project would also result in significant and unavoidable cumulative impacts related to: aesthetics, air quality, water quality, land use, and noise.

B. GROWTH INDUCING IMPACTS OF THE PROPOSED PROJECT

Section 15126.2(d) of the *CEQA Guidelines* requires a discussion of the ways in which a proposed action could induce growth. This includes ways in which the project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Section 15126.2(d) of the *CEQA Guidelines* reads as follows:

"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. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some project which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment."

The proposed project would result in the construction of an asphalt production and recycling facility. As noted in the Initial Study included as Appendix A, the proposed project would not directly induce substantial population growth in the area because it would employ only ten individuals. The ten employees are also not anticipated to result in substantial indirect population growth, as such, employees likely already live within a commuting distance from the project site. Additionally, the facility is a re-location of an existing facility that would be closed. Therefore, the project would not result in long-term employment growth in the area.

The proposed project would include the sale of raw aggregate to area contractors which would result in some economic growth. However, the proposed project would also assist in the construction of residential, commercial and industrial development as well as public infrastructure that serves growth. Overall the project would serve planned growth outlined in applicable General Plans (e.g. Sonoma County General Plan and Marin County General Plan) and would be considered growth accommodating instead of growth inducing.

Other considerations include whether the proposed project would remove an obstacle to growth. There are three existing asphalt plants in Sonoma and Marin counties, including: 1) Bodean, 1060 Maxwell Drive, Santa Rosa; 2) Syar, 260 Todd Road, Santa Rosa; and 3) Dutra, 1000 Point San Pedro Road, San Rafael. Based on these plant locations, it appears the region's needs would still be met for asphalt production and recycling without the proposed project, although implementation of the proposed project would reduce distances and costs for trucks delivering asphalt to projects in southern Sonoma County and northern Marin County.

The project would not result in population increases that would tax existing community service facilities, or require the construction of new community service facilities that could cause significant environmental effects. The project would contribute materials (e.g. asphalt and aggregate) that could be used in the construction of these facilities, however. Therefore, the project would not result in significant growth inducing impacts and project impacts on public services would be less than significant.

Potable water for the proposed project would be served by an existing water connection from the North Marin Water District (NMWD) pipeline that runs along the westerly side of the site. The project also proposes to pump water from the Petaluma River, filter it, and use it for dust suppression in Areas A and C. Other options for future water supply include purchasing Petaluma Ellis Creek Water Treatment Facility reclaimed water, which would need to be trucked to the site. The applicant proposes to install two 20,000 gallon water tanks at the southern boundary of Area C to be used as needed for dust suppression. As such, the project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Sufficient water supplies are available to serve the project from existing entitlements and resources. The proposed project involves the creation of a new septic system that would only serve the project. The project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs. The project would comply with federal, state, and local statutes and regulations related to solid waste.

Due to the project's proposed location and scope, the proposed project could also facilitate other activities that could significantly impact the environment. Specifically, the proposed project could provide asphalt to and thus facilitate construction of the Novato Narrows/Highway 101 Widening Project and associated freeway interchange at Petaluma Boulevard South. While the environmental documentation for these highway improvements is not yet available, it is reasonable to assume that without mitigation, these cumulative or related projects would result in impacts to the environment.

C. SIGNIFICANT IRREVERSIBLE CHANGES TO THE ENVIRONMENT

Section 15126.2© of the *CEQA Guidelines* requires a discussion of the significant irreversible environmental changes of the proposed project, including the following:

- *Uses of nonrenewable resources during the initial and continued phases of the project that may be irreversible because a large commitment of such resources makes removal or nonuse thereafter unlikely;*

- *Primary impacts and, particularly, secondary impacts (such as highway improvement that provides access to a previously inaccessible area), which generally commit future generations to similar uses; and*
- *Irreversible damage that could result from environmental accidents associated with the project.*

Development of the proposed project would represent a long-term commitment to a more intensive land use of the site. The project would, therefore, involve an irreversible commitment to the use of nonrenewable resources during the construction and operation phases in the form of refined petroleum-based fuels, natural gas for space and water heating, and mineral resources used in construction materials. However, this long-term commitment of such non-renewable resources would not be sufficient to cause removal or nonuse thereafter unlikely.

The project includes constructing an asphalt production and recycling facility and restoring 19 acres of wetlands. Such development would help commit future users on the project site and other businesses off the site to similar development. However, the project site is near other industrial uses to the north, and agricultural and open space lands to the south. The project site and surrounding areas are already served by an existing roadway system. Other than the existing access to the off-site residential uses along the River, the roadway infrastructure that would be developed as part of the project would serve the project only and not any adjacent undeveloped lands.

During project construction the project applicant would follow all applicable requirements to ensure safe use, transportation, storage and disposal of any hazardous materials or wastes that could be used or generated. By conforming with existing regulations and the EIR mitigation measures, including the preparation of an Emergency Response Action Plan, the project would not result in any significant hazards to the public or the environment through the routine transport, use, storage, or disposal of hazardous materials or wastes, or through upset or accident conditions. Operational impacts related to hazards and hazardous materials would be reduced to less-than-significant levels via the recommended mitigation measures included in Section IV.F (Hazards and Hazardous Materials).

