

7—OTHER CEQA TOPICS

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7.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires the consideration of a range of additional issues extending beyond analysis of project-specific impacts. This section of the subsequent environmental impact report (SEIR) contains analysis of the following additional CEQA-mandated discussions:

- Mandatory Findings of Significance (Section 15065[a] and Section XXI of the Appendix G of CEQA Guidelines)
- energy consumption and conservation (Section 15126.4[b] and Appendix F of CEQA Guidelines), and
- significant unavoidable adverse impacts (Section 15126.2[c]),
- irreversible/irretrievable commitment of resources (Section 15126.2[d]),
- growth-inducing impacts (Section 15126.2[e])

7.2 MANDATORY FINDINGS OF SIGNIFICANCE

Based on Appendix G of the CEQA Guidelines, the proposed project would have a significant impact on the CEQA mandatory findings of significance if it would:

- a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory;
- b) Have impacts that are individually limited, but cumulatively considerable (“Cumulatively considerable” means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.); or
- c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

Under the *Livermore Amador Valley Quarry Area Reclamation Specific Plan Environmental Impact Report* (LAVQAR EIR) these impacts were determined to be less than significant. However, as stated in the Initial Study (see Appendix A-1, “Initial Study,” of this SEIR) new information and changed circumstances at the site, discussed at length in Sections 4.1 through Chapter 5 of this SEIR, could alter this determination.

Impact 7-1: Substantially Degrade the Quality of the Environment, Reduce Habitat of a Fish or Wildlife Species, Cause a Fish or Wildlife Population to Drop Below Self-Sustaining Levels, Threaten to Eliminate a Plant or Animal Community, Substantially Reduce the Number or Restrict the Range of a Rare or Endangered Plant or Animal or Eliminate Important Examples of the Major Periods of California History or Prehistory

Section 4.3, “Biological Resources,” of this SEIR evaluates biological resources, including impacts from the proposed project on fish and wildlife habitat, biological communities, protected wetlands, and rare or endangered plant species. The SEIR analysis for this CEQA topic determined that the proposed project would have a less than significant impact on biological resources with mitigation incorporated. As a result of this determination, the proposed project would also have a less than significant impact on Impact 7-1 with several Mitigation Measures, listed below, incorporated. Furthermore, the proposed project’s potential to eliminate important examples of major periods of California history or prehistory was determined to be less than significant in the Initial Study (see Appendix A-1).

Level of Significance: Potentially significant.

Mitigation Measures: Relevant mitigation measures required to reduce this impact to a less than significant level include the following measures from Section 4.3, “Biological Resources,” of this SEIR:

- Mitigation Measure 4.3-1a: Obtain Regulatory Entitlements and Authorizations
- Mitigation Measure 4.3-1b: Special Status Amphibian and Reptile Species
- Mitigation Measure 4.3-1c: Nesting Raptors
- Mitigation Measure 4.3-1d: Nesting Birds
- Mitigation Measure 4.3-1e: Loggerhead Shrike
- Mitigation Measure 4.3-1f: Tricolored Blackbird
- Mitigation Measure 4.3-1g: Burrowing Owl
- Mitigation Measure 4.3-1h: Special Status Bats
- Mitigation Measure 4.3-2a: Special Status Plants
- Mitigation Measure 4.3-2b: Riparian Habitat
- Mitigation Measure 4.3-3: 1:1 Wetland Compensation Ratio

Level of Significance after Mitigation: Less than significant.

Impact 7-2a: Impacts that are Individually Limited but Cumulatively Considerable: Conflict with Air Quality Plan

Section 4.2, “Air Quality,” and Chapter 5, “Cumulative Impacts,” of this SEIR evaluate the proposed project’s potential impacts to air quality, including an evaluation of consistency with applicable air quality plans. As described in Section 4.2 and Chapter 5, the Bay Area Air Quality Management District’s (BAAQMD) 2017 Clean Air Plan is the applicable air quality plan for the project and the County. Consistency with the air quality plan is determined by whether the project would hinder implementation of control measures identified in the air quality plan or result in growth of population or employment that is not accounted for in local and regional planning. The Clean Air

Plan requires consistency with Airborne Toxic Control Measures (ATCMs) for idling trucks and on- and off-road diesel using vehicles (BAAQMD 2017). Mitigation Measure 4.2-1 below provides for adherence to these ATCMs.

The Clean Air Plan contains control measures that identify actions to be taken by the air district, local government agencies, and private enterprises to reduce stationary and mobile sources of criteria pollutants and ozone precursors and Toxic Air Contaminant (TAC) emissions in the San Francisco Bay Area Air Basin (SFBAAB) (BAAQMD 2017). As discussed under Impact 4.2-2 below, the proposed project would result in a cumulatively considerable impact due to daily oxides of nitrogen (NO_x) emissions in year 2022. Therefore, project emissions would hinder the air district in its goals for reducing significant air pollutants in the air basin in the short-term. However, the daily NO_x exceedances are related to construction activities required for the reclamation of Lake A and the realignment of the Arroyo del Valle. As such, the emissions are only temporary in nature. Furthermore, the annual NO_x emissions in year 2022 would not exceed the annual thresholds. The remainder of the model years are below the applicable thresholds for all criteria pollutants. Furthermore, as outlined in Impact 4.2-2 below, reducing emissions to a less than significant level would require daily operations to be limited to shorter windows compared to proposed 8 to 12-hour days, which would extend the life of reclamation, thereby also potentially increasing emissions associated with an extended life of the reclamation activities. Therefore, the proposed project's estimated NO_x emissions would constitute a significant and unavoidable impact on consistency of this portion of the Clean Air Plan in the short term.

Level of Significance Before Mitigation: Significant.

Mitigation Measure: Implement Mitigation Measure 4.2-1, "Off-road Equipment Plan" (see Section 4.2, "Air Quality," of this SEIR)

Significance After Mitigation: Significant and Unavoidable.

Impact 7-2b: Impacts that are Individually Limited but Cumulatively Considerable: Criteria Pollutants ROG, CO, SO_x, PM₁₀, and PM_{2.5}

Section 4.2, "Air Quality," and Chapter 5, "Cumulative Impacts," of this SEIR evaluate the proposed project's potential impacts to air quality, including an evaluation of cumulatively considerable increases of criteria pollutants. As described in Section 4.2 and Chapter 5, proposed project operations associated with reclamation would emit criteria air pollutants, including reactive-organic gases (ROG), NO_x, carbon monoxide (CO), sulfur oxides (SO_x), respirable particulate matter (PM₁₀), and particulate matter (PM_{2.5}) from construction equipment and from mobile equipment and motor vehicles associated with excavation, grading/fill, and construction of water management facilities at Lakes A and B.

Section 4.2 presents the daily and annual criteria air pollutants and ozone precursor emissions analyses. The modeling results from *the Air and Greenhouse Gas Emissions Study's* (Appendix C-1) indicate that project criteria pollutant emissions are below applicable BAAQMD thresholds of significance for CEQA except for daily emissions of NO_x. Therefore, the proposed project's estimated ROG, CO, SO_x, PM₁₀, and PM_{2.5} emissions would constitute a less than significant impact.

Level of Significance: Less than Significant.

Mitigation Measure: None required

Impact 7-2c: Impacts that are Individually Limited but Cumulatively Considerable: Criteria Pollutant NO_x

As described in Section 4.2 and Chapter 5, the modeling results from the *Air and Greenhouse Gas Emissions Study* (Appendix C-1, “Air and Greenhouse Gas Emissions Report”) indicate that project criteria pollutant emissions are below applicable BAAQMD thresholds of significance for CEQA except for daily emissions of Nitrogen Oxide (NO_x). Daily emissions of NO_x are exceeded only in model year 2022 (see Table 4.2-3 in Section 4.2), when Lake A reclamation activity and the Lake B realignment of the ADV are assumed to occur simultaneously. Even if evaluated separately, the year 2022 Lake A reclamation activities and 2022 Lake B realignment of the Arroyo would exceed the daily NO_x thresholds, but to a lesser degree. However, these daily NO_x exceedances are related to construction activities required for the reclamation of Lake A and the realignment of the Arroyo del Valle. As such, they are only temporary in nature. In 2022, the annual NO_x emissions would not exceed the annual thresholds (see Table 4.2-4 in Section 4.2). The remainder of the model years are below the applicable thresholds for all criteria pollutants.

Based on the results presented in Section 4.2, NO_x emissions are estimated to exceed BAAQMD CEQA significance thresholds by approximately 425 percent in model year 2022. Mitigation Measure 4.2-1 would reduce daily NO_x emissions during Lake A reclamation and the Lake B realignment of the ADV by approximately 20 percent; however, NO_x emissions would remain well above the threshold during this period of time (BAAQMD 2017). Reducing daily emissions to a less than significant level would require daily operations to be limited to shorter windows compared to the proposed 8 to 12-hour days, which would extend the life of reclamation, thereby also potentially increasing emissions over an extended life of the project. Therefore, this option is not feasible. In addition, because of the necessity to mobilize equipment each day, NO_x emissions would be increased over the life of the project should additional daily reductions be implemented. Therefore, the proposed project’s estimated NO_x emissions would constitute a significant and unavoidable impact.

Level of Significance Before Mitigation: Significant.

Mitigation Measure: Implement Mitigation Measure 4.2-1, “Off-road Equipment Plan” (see Section 4.2, “Air Quality,” of this SEIR)

Significance After Mitigation: Significant and Unavoidable.

Impact 7-3: Environmental Effects which will Cause Substantial Adverse Effects on Human Beings

Under CEQA, a change to the physical environment that might otherwise be minor must be treated as significant if people will be significantly affected. This factor relates to adverse changes to the environment of human beings generally, and not to effects on particular individuals. While changes to the environment that could indirectly affect human beings will be represented by all of the designated CEQA issue areas, those that could directly affect human beings include aesthetics, air quality, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, population and housing, public services, transportation/traffic, and utilities, which are addressed in this SEIR and the Initial Study (see Appendix A-1).

Section 4.2 of this SEIR notes significant and unavoidable impacts relating to NO_x emissions. However, the daily NO_x exceedances are related to construction activities required for the reclamation of Lake A and the realignment of the ADV. As such, they are only temporary in nature. In 2022, the annual NO_x emissions would not exceed the annual thresholds. Because the exceedances would only have a short-term impact, this impact would not cause a substantial adverse effect on human beings. As described in Section 4.2 of this SEIR, human health risks from the proposed project would be less than significant.

The SEIR and Initial Study jointly state that the proposed project's impacts on greenhouse gas emissions, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, population and housing, public services, transportation/traffic, and utilities would be less than significant or less than significant with mitigation incorporated.

Level of Significance Before Mitigation: Potentially Significant.

Mitigation Measures: Relevant mitigation measures required to reduce most of this impact to a less than significant level include:

- Mitigation Measure 4.1-1: Hourly Limitation of Construction Activities. See Section 4.1, "Aesthetics and Visual Resources."
- Mitigation Measure 4.2-1: Off-road Equipment Plan. See Section 4.2, "Air Quality."
- Mitigation Measure 4.4-1: Erosion Control Plan. See Section 4.4, "Geology and Soils."
- Mitigation Measure 4.4-2: Berm and Embankment Grading.
- Mitigation Measure 4.4-3: Embankment Fill Slope Geometry
- Mitigation Measure 4.4-4: Cut Slope of Lake B Adjacent to Realigned ADV
- Mitigation Measure 4.5-1a: Idling Times. See Section 4.5, "Greenhouse Gas Emissions."
- Mitigation Measure 4.5-1b: Idling Times for Diesel-powered Equipment.
- Mitigation Measure 4.5-1c: Equipment Maintenance.
- Mitigation Measure 4.5-1d: Alternative Fuel Plan.
- Mitigation Measure 4.5-1e: Local Building Materials.
- Mitigation Measure 4.5-1f: Recycle or Reuse Construction and Demolition Materials.
- Mitigation Measure 4.5-1g: On-site material hauling.
- Mitigation Measure 4.5-1h: Generator Alternative Fuel.
- Mitigation Measure 4.6-1: Development of SWPPP. See Section 4.6, "Hydrology and Water Quality."
- Mitigation Measure 4.6-2: Implementation of Adaptive Management Program for Iron
- Mitigation Measure 4.6-3: Conveyance to Avoid Lake B Silt Storage Area
- Mitigation Measure 4.8-1a: Notice of Activities. See Section 4.8, "Noise."
- Mitigation Measure 4.8-1b: Mufflers.

Level of Significance After Mitigation: Less than Significant.

7.3 ENERGY CONSUMPTION AND CONSERVATION

CEQA requires an environmental impact report to include a discussion of mitigation measures to minimize significant effects on the environment relating to “wasteful, inefficient, and unnecessary consumption of energy” (PRC Section 21100[b][3]). Appendix F of the CEQA Guidelines provides guidance for analyzing energy impacts in an EIR, but neither Appendix F itself, nor any authority, requires that an EIR discuss every possible energy impact or conservation measure listed in Appendix F. Energy impacts need only be discussed “to the extent relevant and applicable to the project” (CEQA Guidelines Appendix F, Section II).

Appendix F states 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 fossil fuels such as coal, natural gas and oil, and (3) increasing reliance on renewable energy sources” (CEQA Guidelines Appendix F, Section I). In addition, factors suggested in Appendix F for determining and mitigating potentially significant energy impacts may be relevant to this project’s fuel usage and energy consumption. These factors are discussed herein, where relevant, for mobile equipment and electric utility service used by the project.

7.3.1 Transportation Energy Use, Energy Requirements, and Efficiencies

Appendix F of the CEQA Guidelines suggests consideration of “the project’s transportation energy use requirements and its overall use of efficient transportation alternatives” (CEQA Guidelines Appendix F Section II.C.6). It also suggests consideration of “the project’s energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal” (CEQA Guidelines Appendix F Section II.C.1).

The project involves revisions to approved reclamation activities and does not involve permitted mining activities. The proposed project activities involving transportation that would consume energy include operation of heavy off-road equipment, trucks, worker traffic, vendor, and haul trips to conduct reclamation activities at the site. The emissions for these activities are included in Appendix C-1. These activities would be similar to the use under the approved reclamation plan.

The project is designed to use materials available on-site whenever possible, which would reduce the haul trips necessary, which in turn would reduce the amount of fuel the project requires. Materials stored on-site are also located to minimize the distance they must be moved to be placed in their final location, which conserves fuel use. Additionally, increasingly stringent federal and state regulations on engine efficiency combined with federal, state, and local regulations limiting engine idling times would further reduce the amount of transportation fuel demand. Considering these reductions in transportation fuel use and electricity use, the proposed project would not result in the wasteful and inefficient use of energy resources.

7.3.2 Energy Supply Capacity and Peak Period Demand

Appendix F of the CEQA Guidelines also suggests consideration of both “the effects of the project on local and regional energy supplies and on requirements for additional capacity” (CEQA Guidelines Appendix F Section II.C.2), and “the effects of the project on peak and base period demands for electricity and other forms of energy” (CEQA Guidelines Appendix F Section II.C.3).

Energy use related to the proposed project would be similar to the use under the approved reclamation plan. In addition, reclamation activities would use less energy than the mining and processing activities currently occurring on-site. Thus, no impact would occur related to this issue.

7.3.3 Energy-Efficient Project Features and Mitigation Measures

Appendix F of the CEQA Guidelines suggests consideration of “potential measures to reduce wasteful, inefficient and unnecessary consumption of energy during construction, operation, maintenance and/or removal” (CEQA Guidelines Appendix F Section II.D.1). Additionally, Appendix F suggests consideration of “energy conservation which could result from recycling efforts.” (CEQA Guidelines Appendix F Section II.D.5.)

The project involves revisions to approved reclamation activities and does not involve permitted mining activities. The proposed project activities would consume energy through the operation of a temporary pump for a dry-season low-flow water diversion to support the realignment of the ADV, as well as the operation of heavy off-road equipment, trucks, worker traffic, and haul trips to conduct reclamation activities at the site.

As described in Section 4.5, “Greenhouse Gas Emissions,” (GHG), the proposed project would implement the following mitigation measures that would reduce wasteful, inefficient and unnecessary consumption of energy during construction, operation, maintenance and/or removal, as well as promote energy conservation resulting from recycling efforts.

Mitigation Measure 4.5-1a: Idling Times

Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. [Measure applies to idling times for all equipment].

Mitigation Measure 4.5-1b: Idling Times for Diesel-powered Equipment

Minimize the idling time of diesel-powered construction equipment to two minutes. [Measure applies to idling times for diesel-powered equipment only].

Mitigation Measure 4.5-1c: Equipment Maintenance

All construction equipment shall be maintained and properly tuned in accordance with manufacturer’s specifications.

Mitigation Measure 4.5-1e: Local Building Materials

Use at least 10 percent local building materials in construction (e.g., construction aggregates, concrete pipe).

Mitigation Measure 4.5-1f: Recycle or Reuse Construction and Demolition Materials

Recycle or reuse at least 50 percent of construction waste or demolition materials (e.g., during decommissioning and removal of processing plant facilities).

Mitigation Measure 4.5-1g: On-site Material Hauling

Perform on-site material hauling with trucks equipped with on-road engines (if less emissive of GHG emissions than off-road engines), if available.

Furthermore, many of the state and local plans regarding energy efficiency (e.g., the Community Climate Action Plan (CCAP), an Element of the Alameda County General Plan [Alameda County 2014]) are focused on increasing building efficiency and renewable energy generation and reducing water consumption and vehicle miles traveled (VMT). The project would not include construction of a building or result in a land use that would increase energy use; thus, no policy specifically applies to the project. As described above, the proposed project activities would not result in wasteful or inefficient use of energy. Therefore, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Finally, the mitigated proposed project considers energy conservation from recycling efforts by implementing Mitigation Measure 4.5-1a through 4.5-1g.

7.3.4 Renewable Energy Sources

Appendix F of the CEQA Guidelines also suggests that the potential for use of “alternate fuels (particularly renewable ones) or energy systems” be discussed in an EIR (CEQA Guidelines Appendix F Section II.D.4).

As stated in Section 7.3.2 above, energy use related to the proposed project would be similar to the use under the approved reclamation plan. In addition, reclamation activities would use less energy than the mining and processing activities currently occurring on-site.

Electricity at the site is supplied by PG&E. The California Renewables Portfolio Standard (CRPS) requires that electrical service providers, such as PG&E, achieve the following percentages of energy provided from renewable sources: 33 percent by December 31, 2020 and 60 percent by 2030. By 2045, all retail sellers must procure 100 percent of their retail sales from CRPS-eligible resources (CPUC 2020). According to California Public Utility Commission (CPUC), in 2019 PG&E provided 39 percent of its energy from renewable sources (CPUC 2019). Because the project will obtain some electricity from PG&E or another supplier which much comply with the CRPS, a substantial portion of the energy used by the project would be generated from renewable sources. However, the project will primarily rely on mobile sources of energy, or fuel, for carrying out reclamation activities.

As described in Section 4.5, “Greenhouse Gas Emissions,” the proposed project would implement Mitigation Measures 4.5-1b, “Alternative Fuel Plan,” and 4.5-1h, “Generator Alternative Fuel,” which would require a plan demonstrating that alternative fueled (e.g., biodiesel, electric) construction vehicles/equipment will represent at least 15 percent of the construction fleet and require alternative fuels for generators at construction sites such as propane or solar, or use electrical power, as feasible for each construction site.

7.4 SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

CEQA Guidelines Section 15126.2(c) requires that the EIR discuss significant environmental effect that cannot be avoided if the project is implemented, even with mitigation incorporated. According to Guidelines Section 15126(c):

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.

This EIR identifies significant environmental effects that cannot be avoided if the project is implemented. As discussed in greater length in Section 2.1 of Chapter 2, “Project Description,” changes in circumstances at the project site and in applicable regulatory requirements necessitate the preparation of an amended reclamation plan that addresses these changes and provides reclamation objectives that can be feasibly accomplished and permitted by regulatory agencies. If the County decides to approve this project, the County will adopt a Statement of Overriding Considerations that explains the County’s rationale as to why they approved the project notwithstanding the identified significant environmental effects that cannot be avoided, which are summarized below.

Table ES-2, “Summary of Project Impacts and Mitigation Measures,” provides a summary of the project impacts identified and evaluated in the SEIR, presents mitigation measures identified in the SEIR, and lists the impact significance both without and with mitigation applied. The following impacts were found to be significant and unavoidable, as feasible mitigation is either unavailable or would not effectively reduce the severity of the impact to less than significant:

- Impact 4.2-1: Conflict with or Obstruct Implementation of the Applicable Air Quality Plan (significant and unavoidable); and
- Impact 4.2-2a: Result in a Cumulatively Considerable Net Increase of Any Criteria Pollutant for which the Project Region is Non-Attainment Under an Applicable Federal or State Ambient Air Quality Standard: NO_x (significant and unavoidable).

The analysis also determined that the project significant and unavoidable impacts would result in the following significant cumulative impacts. (see Chapter 5, “Cumulative Impacts”).

- Impact 7-2a: Impacts that are Individually Limited but Cumulatively Considerable: Conflict with Air Quality Plan (significant and unavoidable); and
- Impact 7-2b: Impacts that are Individually Limited but Cumulatively Considerable: Criteria Pollutant NO_x (significant and unavoidable).

7.5 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES THAT WOULD BE CAUSED BY THE PROJECT SHOULD IT BE IMPLEMENTED

Public Resources Code Section 21100(b)(2)(B) and CEQA Guidelines Section 15126.2(d) require that the EIR discuss significant irreversible environmental changes that would be caused by the project should it be implemented. According to Guidelines Section 15126(d):

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.

The primary irreversible environmental changes caused by the project would be a commitment of nonrenewable resources needed to conduct revised reclamation activities, such as Arroyo del Valle (ADV) realignment, grading, excavating, and building the diversion and water conveyance structures. Nonrenewable and limited resources consumed during project construction and operation would include oil, diesel fuel, metal, plastic, aggregate materials, cement, and propane. However, the site is currently

subject to an approved reclamation plan, which would use these nonrenewable resources in similar fashion to the proposed project. The project site would be reclaimed to allow for water management. Areas not intended for water management are designated for agriculture or open space uses. The portion of the site intended for water management would not be available to future generations for uses other than water management.

The project includes design considerations and mitigation measures to reduce the likelihood of irreversible damage from environmental impacts that could be associated with the project. Environmental impacts that would occur as a result of the project are presented in Sections 4.1 through 4.8 of this SEIR and summarized in Table ES-2, “Summary of Project Impacts and Mitigation Measures.”

7.6 GROWTH INDUCING ANALYSIS OVERVIEW

Public Resources Code (PRC) Section 21100(b)(5) specifies that an EIR must address a project’s growth inducing impacts. CEQA Guidelines Section 15126.2(d) requires that the scope of the analysis “discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.”

Direct growth inducing impacts occur when a project imposes new burdens on a community by directly inducing population growth, or by leading to the construction of additional developments in the same area. Indirect growth could be associated with project activities that remove physical obstacles to population growth, such as installation of transportation or utility infrastructure with excess capacity available to serve additional growth.

The proposed project is not expected to induce growth or result in secondary growth-inducing impacts. The project would not result in new employment opportunities, and therefore would not induce a demand for new housing and services. The nature of the project, revisions to an approved reclamation plan, is such that there would be no new direct customers and no incentive for other residences or businesses to locate nearby. Production of electricity from the project facilities is ongoing and would not create additional availability of energy resources beyond those already permitted for the facilities.