APPENDIX L

NOTICE OF PREPARATION

WATER RECLAMATION
SOLID WASTE MANAGEMENT

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

JAMES F. STAHL
Chief Engineer and General Manager

September 20, 2004

File: 20.00-00.00

To: **Mailing List**

Subject: **NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT**

Project Title: **Palmdale Water Reclamation Plant 2025 Facilities Plan**

Project Location: **City of Palmdale, Los Angeles County**

Project Description: **The project consists of the preparation of a facilities plan for County Sanitation District No. 20 of Los Angeles County's (District No. 20) Palmdale Water Reclamation Plant (PWRP). The plan will assess the wastewater treatment and effluent management needs of District No. 20 through the year 2025, and recommend specific improvements to meet those needs.**

This Notice of Preparation (NOP) has been prepared in accordance with the California Environmental Quality Act (CEQA). Pursuant to CEQA, the District will be the Lead Agency and, due to the scope of the project, will prepare an Environmental Impact Report (EIR). The project description, location, and the potential environmental impacts are contained in the attached materials. It is anticipated that the EIR will be sufficient to comply with the National Environmental Policy Act for preparation of an Environmental Assessment for project alternatives that would require any federal approval(s).

If you are a Responsible or Trustee Agency, District No. 20 is soliciting written comments as to the scope and content of the environmental information, including alternatives, impacts, and mitigation measures, that may be relevant to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by District No. 20 when considering any permit or other approval for the project. Please provide the name and telephone number of a contact person in your agency with your response.

If you are an interested party or property owner, District No. 20 is requesting your written comments concerning any effects the project may have on your property or your community. Please share this NOP with anyone else you feel may be interested in this project. In addition, this NOP can be found at www.lacsd.org.

In addition to written comments, a Scoping Meeting will be held to receive comments as to the scope of analysis and content of the proposed EIR. The Scoping Meeting will be held on Thursday, October 7, 2004, at 7:00 p.m., at the Larry Chimbole Cultural Center, Mazanita Ballroom, 38350 Sierra Highway, Palmdale, California.

Based on the time limits mandated by CEQA, responses to the NOP must be received no later than 30 days after receipt of this notice. Please submit your written response to District No. 20 at the earliest possible date, but no later than October 25, 2004. Your response should be directed to the undersigned at the address shown above.

Date: September 20, 2004

Steven W. Highter
Supervising Engineer, Planning Section

N:\Palmdale 2025\NOP\PWRP 2025 NOP.cover letter.doc

COUNTY SANITATION DISTRICT NO. 20 OF LOS ANGELES COUNTY
PALMDALE WATER RECLAMATION PLANT 2025 FACILITIES PLAN

NOTICE OF PREPARATION
OF AN ENVIRONMENTAL IMPACT REPORT

1.0 INTRODUCTION

County Sanitation District No. 20 of Los Angeles County (District No. 20) is preparing the Palmdale Water Reclamation Plant (PWRP) 2025 Facilities Plan (2025 Plan) to propose upgrades and expansion of wastewater treatment and effluent management facilities to meet the needs of District No. 20 through the year 2025. This Notice of Preparation (NOP) has been prepared pursuant to the requirements of the California Environmental Quality Act (CEQA) to notify Responsible and Trustee Agencies that an Environmental Impact Report (EIR) will be prepared to assess potential impacts of the project.

2.0 BACKGROUND

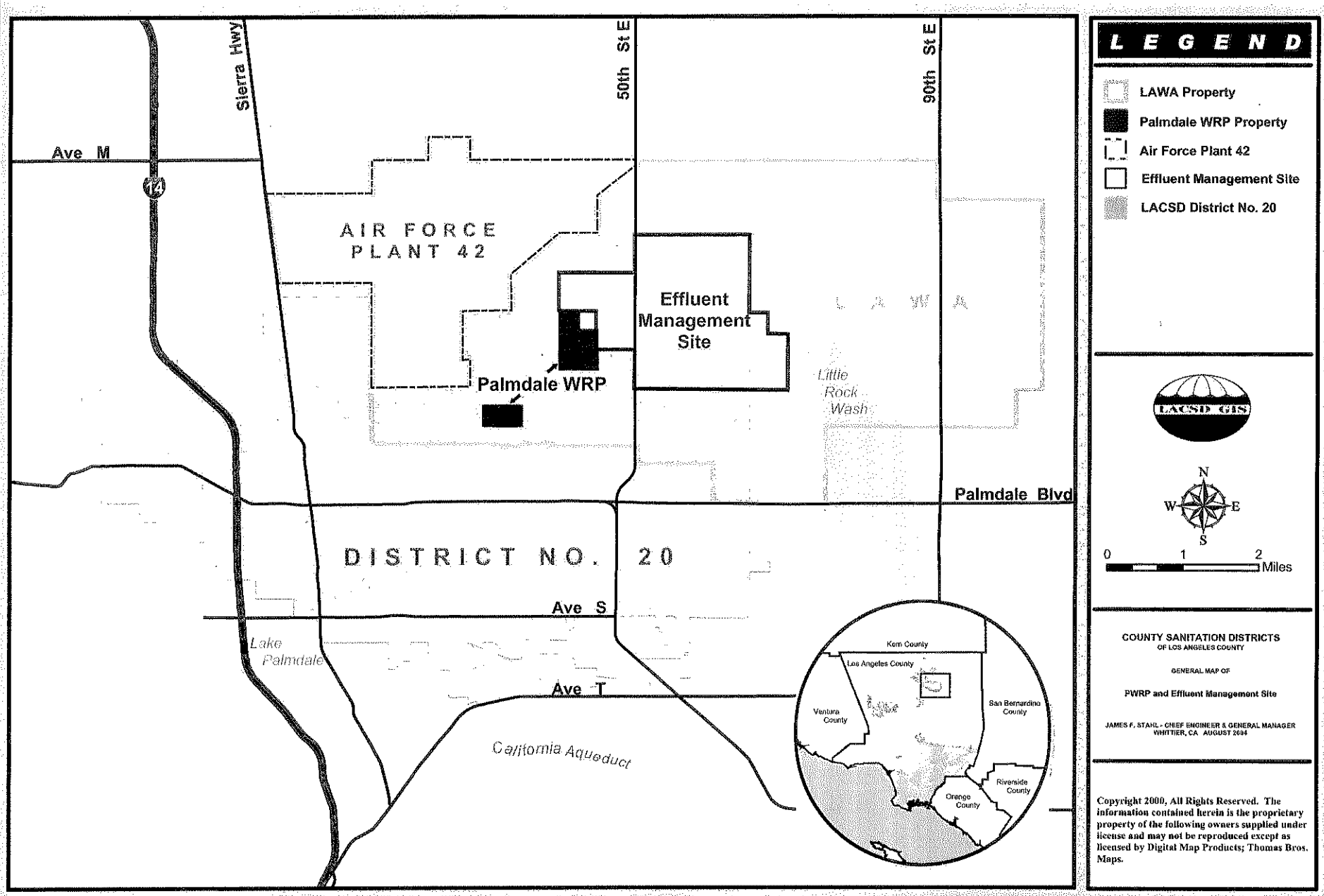
The County Sanitation Districts of Los Angeles County (Districts) are a confederation of special districts that serve the wastewater and solid waste management needs of approximately 5.1 million people in Los Angeles County. The Districts' service area covers approximately 800 square miles and encompasses 78 cities and unincorporated territory within the County. The Districts were formed under authority provided by the County Sanitation District Act of 1923, which authorized the formation of sanitation districts based on the drainage areas that determine efficient wastewater management instead of political boundaries. The Act authorized the Districts to construct, operate, and maintain facilities for the collection, treatment, and disposal of wastewater. The Act was amended in 1949 to allow the Districts to also provide solid waste management and disposal services, including refuse transfer and resource recovery. The local sewers and laterals that connect to the Districts' trunk sewers and the collection and transport of solid waste to Districts' facilities are the responsibilities of local jurisdictions.

District No. 20 provides wastewater management services for the City of Palmdale and nearby areas of unincorporated Los Angeles County (see Figure No. 1). District No. 20 owns and operates a network of trunk sewers that extends throughout its service area. The trunk sewers convey wastewater to the PWRP, which is located near the intersection of 30th Street East and Avenue P-8. (Additional PWRP treatment facilities are located at the intersection of 40th Street East and Avenue O-8.)

District No. 20's trunk sewer network forms the backbone of the regional wastewater collection system. Lateral sewers, which collect wastewater generated at individual properties, drain to local

Figure No. 1

Palmdale WRP and Effluent Management Site



sewers that are owned, operated, and maintained by local jurisdictions. Local sewers drain to District No. 20's trunk sewers.

The permitted treatment capacity of the PWRP is 15.0 million gallons per day (mgd); the PWRP currently treats an average flow of approximately 9.2 mgd. The PWRP provides treatment to all influent wastewater utilizing primary settling tanks, secondary treatment oxidation ponds, and an interim chlorination facility. It is anticipated that permanent disinfection facilities currently under construction will be operational by spring 2005. Solids from the primary sedimentation tanks are anaerobically digested and air-dried onsite, and the resultant biosolids are hauled offsite for use as a soil amendment or transported to a local landfill.

The PWRP produces recycled water that may be reused in accordance with regulations promulgated by the state of California Department of Health Services in Title 22 of the California Code of Regulations (Title 22). Recycled water produced at the PWRP is discharged and/or reused on land leased from Los Angeles World Airports (LAWA) at the Palmdale Regional Airport (PMD).

Currently, the recycled water produced at the PWRP is being utilized to irrigate 1,220 acres of fodder crops (including alfalfa, barley, oats, and Sudan grass), 23 acres of pistachio trees, and 28 acres of evergreen trees. Since the PWRP has no seasonal storage capacity, much of the recycled water must be discharged to a land application area during the winter months when crop irrigation demands are lowest.

3.0 NEED FOR PROJECT

The proposed project is needed to accommodate projected increases in wastewater flow in the service area of District No. 20 through the year 2025. Based on the latest population projections provided by the Southern California Association of Governments (SCAG), wastewater flows are projected to reach approximately 22.5 mgd by 2025. As discussed above, the current PWRP facilities have a capacity to treat only 15 mgd, and the PWRP's effluent management site is not large enough to beneficially reuse all of the recycled water through crop irrigation, even if seasonal storage reservoirs are available.

In addition, since 2000, the PWRP has come under increasingly more stringent regulatory requirements, including Revised Waste Discharge Requirements (WDRs), Revised Monitoring and Reporting Programs (MRPs), and a Cleanup and Abatement Order (CAO). For example, in response to the CAO, a groundwater remediation plan for the removal of nitrates in the groundwater is being considered by the Regional Board. This plan generally consists of minimizing the quantity of recycled water discharged to the land application area, groundwater extraction wells, and a water distribution system for using the extracted water for crop irrigation to remove nitrogen. In order to comply with these requirements, District No. 20 will carry out a facilities planning process to identify treatment plant modifications and upgrades best suited to meet these new requirements,

while still providing cost effective service. As part of the plant modifications, additional nitrogen removal will be included in the treatment process.

4.0 PALMDALE WATER RECLAMATION PLANT 2025 FACILITIES PLAN

4.1 Objectives

The goal of the 2025 Plan is to meet the following objectives in an environmentally sound and cost effective manner:

- Provide wastewater treatment capacity adequate to meet the future needs of District No. 20 through the year 2025.
- Provide effluent management capacity adequate to meet the existing and future needs of District No. 20 through the year 2025.
- Provide a long term solution for meeting water quality requirements set forth by regulatory agencies.
- Provide an effluent management solution that accommodates emerging recycled water reuse opportunities in District No. 20's service area and the Antelope Valley.

4.2 Proposed Project Alternatives

In order to meet the project objectives, the following project alternatives will likely be considered in the 2025 Plan for wastewater treatment, effluent management, and biosolids management. Factors such as increased familiarity with the project and input from agencies and the general public may result in the development of additional project alternatives during the facilities planning process.

4.2.1 *Wastewater Treatment Alternatives*

District No. 20 has generated a preliminary list of wastewater treatment alternatives with an emphasis on the need to reduce nitrogen levels in the PWRP effluent. Some of these alternatives consist either wholly or partially of treatment methods in use at one or more of the Districts' facilities. Other alternatives, however, will require research and special studies to determine whether they can provide adequate nitrogen removal. The treatment methods being considered at this point in the facilities planning process are listed below in the order of increasing levels of treatment.

- Primary
  - -Sedimentation Tanks
- Secondary
  - -Oxidation Ponds
  - -Activated Sludge (AS)
  - - Membrane Bioreactor (MBR)

- Tertiary
  - -Multi-Media Filtration
  - -MBR
- Advanced Tertiary
  - -Microfiltration/Reverse Osmosis (MF/RO)

The 2025 Plan will consider each of these treatment alternatives independently and, in some cases, in combination with one another. A treatment capacity of approximately 22.5 mgd will need to be achieved by the year 2025, possibly through phased plant expansions. Regardless of which treatment alternative is selected, the treatment will include a nitrogen reduction component, such as nitrification/denitrification (NDN), to ensure regulatory compliance. It is anticipated that the existing PWRP head-works (influent pumps, comminutors, and aerated grit channels), primary, solids processing, and disinfection facilities will remain in service. Each of the treatment alternatives will require an expansion of these facilities to accommodate the projected increase in flows. Such expansion of the head-works, primary, solids processing, and disinfection facilities is anticipated to occur at the PWRP adjacent to the existing facilities. It is possible that all or a portion of the existing secondary facilities (oxidation ponds) will be phased out of service and either abandoned, demolished, or converted to another use, such as effluent storage reservoirs.

The following is a brief description of the secondary and tertiary treatment alternatives currently being considered for evaluation in the 2025 Plan.

Oxidation Ponds. This method of secondary treatment is sometimes referred to as stabilization ponds. Oxidation ponds typically consist of large shallow earthen basins in which oxygen is introduced to primary effluent by means of mechanical aerators. Biological microorganisms that consume the organic materials eventually settle out by means of gravity, resulting in an oxidation pond effluent that meets state standards for secondary recycled water. Oxidation ponds are commonly used where land is plentiful and low operating costs are desirable.

Activated Sludge. AS treatment is the most commonly used method of secondary wastewater treatment in the United States. This treatment technique utilizes a series of tanks that are aerated by diffusers and contain bacteria (activated sludge) that feed on the organic material in the incoming wastewater. The mixture of wastewater and activated sludge then flows into tanks where the activated sludge is settled out by means of gravity. A small portion of the activated sludge is returned to the aeration tanks to continue the biological process, while the treated wastewater flows out of the settling tanks. The remaining sludge that is not recycled is removed, or wasted, from the settling tanks for solids treatment. CAS is typically used in more urbanized areas with less available land for facility siting, and where secondary effluent quality is more strictly regulated.

Multi-Media Filtration. This common means of tertiary treatment provides further polishing to secondary effluent, thus making the recycled water suitable for a greater variety of reuse applications under state standards. Multi-media filters typically consist of deep concrete tanks or tanks layered with different-sized media (such as gravel, sand, and/or activated carbon) that filter any remaining microscopic particulate matter as the secondary effluent passes through by means of gravity or hydraulic pressure. Typically, chemicals are added prior to filtration in order to induce coagulation of any remaining particulate matter, thereby increasing the efficiency of the filtering process.

Membrane Bioreactor. MBR is a relatively new tertiary treatment technology, and its use in the United States in large-scale applications has been limited. The MBR process combines aeration tanks with submerged membranes that separate solids from the wastewater as it moves from one side of the membrane to the other. Accumulated sludge generated by the biological organisms is removed, or wasted, periodically from the process for solids treatment.

Microfiltration/Reverse Osmosis. The microfiltration treatment provides additional filtration of small particles (typically 0.01 micron through 20 microns). Reverse osmosis is a physical separation process, in which water is pressurized and passed through a semi-permeable membrane. Molecular constituents, for example, calcium, magnesium, etc., larger than the molecular pore size of the membrane do not pass through, and exit the membrane system as a concentrate. Water molecules pass through the membrane and exit the system as a clean product.

4.2.2 *Effluent Management Alternatives*

In addition to the preliminary list of treatment alternatives, District No. 20 has generated a preliminary list of effluent management alternatives for the PWRP. The 2025 Plan will consider each of these effluent management alternatives independently and, in some cases, in combination with one another. Most of these alternatives have been recently evaluated for use at the Lancaster Water Reclamation Plant, which is operated by District No. 14 in the Antelope Valley. It is important to note that each effluent management alternative must be evaluated in the context of the treatment alternatives detailed above, since some of the effluent management options are tied to specific levels of treatment. For example, secondary effluent can be used for irrigation of fodder crop, but would require additional tertiary treatment for any spray irrigation of parks and golf courses. Any effluent management option that was tied to a planned recharge of groundwater would, at minimum, require tertiary treatment, and possibly even more advanced treatment. The alternatives that have thus far been considered for effluent management are listed below and then discussed in the following paragraphs.

- Agricultural Reuse
- Evaporation Ponds

- Discharge to Surface Waters
- Municipal Reuse
- Groundwater Recharge

Agricultural Reuse. This project alternative for effluent management would involve the leasing or purchase of additional land for development of expanded agricultural reuse operations and associated storage reservoirs. The total number of acres of land to be leased or purchased would be calculated based on a water balance recognizing that crop irrigation demands are considerably less in the winter than in the summer. Storage reservoirs would likely be necessary in order to hold much of the recycled water produced during the winter months, which then would be used to irrigate crops at agronomic rates during the summer months when irrigation demand is higher.

Evaporation Ponds. Under this project alternative, land would be purchased by District No. 20 to construct shallow ponds. PWRP effluent would be discharged to the shallow ponds where it would evaporate. The evaporation ponds would be designed to retain effluent during the winter months, when the amount of recycled water produced at the plant greatly exceeds evaporation rates. This recycled water would evaporate during the summer months, when evaporation rates exceed discharges to the ponds. Additionally, the evaporation ponds would be designed to be completely dry for a short period of time each year to minimize algae growth. The area and depth of the ponds would be determined by balancing effluent discharge rates to the ponds with expected evaporation rates.

Discharge to Surface Waters. Discharge to surface waters is an effluent management alternative used throughout Los Angeles County. Depending on the water body targeted and the beneficial uses that are supported by the water body, there would be varying requirements for the level of treatment necessary prior to discharge. At a minimum, the PWRP would have to be upgraded to tertiary treatment. In addition, this effluent management option would involve the construction of pumping and distribution systems. Nearby water bodies that would be considered for surface discharge include Little Rock Wash, Big Rock Wash, Lake Los Angeles, California Aqueduct, Lake Palmdale, Santa Clara River, and abandoned rock quarries.

Municipal Reuse. This effluent management alternative would involve the use of recycled water to satisfy a variety of municipal needs such as the irrigation of street medians and city parks. At minimum, a tertiary level of treatment would be required. At this time, the infrastructure to support municipal reuse does not exist in the vicinity of the PWRP. This alternative would require the participation and cooperation of a local water purveyor, such as the Palmdale Water District, and/or the City of Palmdale to construct a system to distribute the recycled water. District No. 20 is not a water purveyor and any attempt to complete a groundwater recharge project and extract the stored water at a later date would be a violation of law regarding duplication of public services.

Groundwater Recharge. Groundwater recharge is an effluent management alternative used elsewhere in Southern California, although it has not been applied in the Antelope Valley. The California Department of Health Services (DHS) currently evaluates groundwater recharge projects based on existing draft regulations, which are used as guidelines. At a minimum, a tertiary level of treatment would be required, and recycled water would have to be blended with another source of water before recharge. The blending ratio of supply water to recycled water can range from 1:1 to 4:1, or even higher, depending on several factors including the level of treatment and proximity to domestic water supply wells. Department of Health Service guidelines limit the ratio of recycled water injected to groundwater extracted for municipal water supply to 50 percent, require at least 12-months retention in the basin prior to withdrawal at a domestic supply well, and mandate a minimum horizontal distance of 2,000 feet between the point of injection and the point of withdrawal at a domestic water supply well. Successful groundwater recharge via surface spreading depends on locating the spreading basins where the soil conditions are conducive to infiltration. In contrast, groundwater recharge via injection wells applies the water directly to the groundwater table. Because groundwater recharge projects are very difficult and complex, they can take five to ten years to become fully permitted.

Construction of the necessary wastewater treatment and effluent management facilities to accommodate 2025 flow projections could occur all at once or in phases. If construction is phased, the first phase will, at minimum, upgrade existing treatment facilities to reduce nitrogen levels in the effluent and the amount of nitrate discharged to the groundwater.

4.2.3 *Biosolids Management Alternatives*

It is anticipated that biosolids, solids processed in anaerobic digesters, will continue to be dried in drying beds and hauled off-site for disposal and/or reuse. However, solids processing may significantly increase if activated sludge is implemented. Additionally, production of digester gas may increase, too, which could make it economically feasible to install gas-to-energy equipment to assist with facility energy demands.

5.0 POTENTIAL ENVIRONMENTAL EFFECTS

The 2025 Plan will identify wastewater treatment and effluent management facilities necessary to meet projected wastewater flows in District No. 20's service area through the year 2025. The EIR for the 2025 Plan will assess potential impacts for full implementation of the treatment and effluent management facilities through the year 2025. The EIR will assess various project alternatives, including the CEQA-required *No Project* alternative, at an equal level of detail. The following sections provide preliminary assessment of potential impacts of the proposed project.

5.1 Land Use

Expansion and upgrade of the PWRP treatment facilities would likely occur within the existing plant site, with the exception of additional oxidation ponds. However, the effluent management system will require acquisition of additional land for facilities, including conversion of open space to agricultural land. Of the effluent management alternatives being considered, evaporation ponds and the agricultural reuse with storage reservoirs would require the most acreage. Potential conflicts with existing and planned operations at United States Air Force Plant 42 and the Palmdale Airport (PMD) would need to be evaluated (see Figure No. 1). The EIR will evaluate potential land use impacts and identify appropriate mitigation measures to minimize such impacts.

5.2 Agricultural Resources

Potential impacts to agricultural resources may occur should construction of effluent storage reservoirs cause existing farmland to be converted to non-farming uses. Temporary and minimal impacts may also occur during construction of recycled water pipelines, however, access to recycled water will provide long-term benefits for local farmers who are currently relying on pumped groundwater and imported water for crop irrigation. The EIR will evaluate potential impacts to agricultural resources and identify appropriate mitigation measures to minimize such impacts.

5.3 Visual Resources

Potential impacts to visual resources of the Antelope Valley will be evaluated. Since treatment plant expansions and upgrades would likely occur on the existing facility site, there likely will be no significant alterations to the existing visual conditions. Evaporation ponds and storage reservoirs could introduce visual obstructions and change the local character of the area. Agriculture would generally be compatible with the local land uses. Construction of recycled water distribution systems could temporarily alter local aesthetics. The EIR will evaluate potential aesthetic impacts and identify appropriate mitigation measures to minimize such impacts.

5.4 Cultural Resources

Cultural resources, including archaeological and paleontological resources, could be encountered in previously undisturbed areas, although locating historic monuments and landmarks within the study area is not anticipated. Archaeological resources could be uncovered during any of the subsurface construction activities associated with the effluent management alternatives. In the event of discovery of any historic resources during construction and/or operation, appropriate actions would be taken. The EIR will evaluate potential impacts to cultural resources and identify appropriate mitigation measures to minimize such impacts.

5.5 Biological Resources

The treatment plant expansion and upgrades will likely have no adverse impacts on biological resources since the construction and operation activities are anticipated to occur within the PWRP site. However, some of the acreage under consideration for the effluent management portion of the project is currently undeveloped. Therefore, the project could impact dry land biological resources in these undeveloped areas. The areas will be assessed for their potential habitat value for listed species, such as the desert tortoise and Mohave ground squirrel. The EIR will evaluate potential impacts to biological resources and identify appropriate mitigation to minimize such impacts.

5.6 Transportation

Construction impacts associated with transportation will be assessed in the EIR, including the construction of storage reservoirs and a recycled water distribution system. Construction activities could temporarily increase traffic on local roadways or result in lane closures or full road closures. The EIR will evaluate potential impacts to transportation and identify appropriate mitigation measures to minimize such impacts.

5.7 Hydrology and Water Quality

Proposed wastewater treatment and effluent management facilities could potentially affect groundwater quality, surface water quality, surface drainage, and 100-year flood plains. Groundwater recharge could adversely affect groundwater quality, but could also provide substantial benefit to local water supplies. Construction of treatment and effluent management facilities could adversely affect storm water runoff. The EIR will evaluate potential hydrology and water quality impacts and identify appropriate mitigation measures to minimize such impacts.

5.8 Geologic Hazards and Soils

The wastewater treatment and effluent management facilities would be subject to geologic hazards, including seismic hazards and levee failure hazards associated with the evaporation ponds and storage reservoir alternatives. The Antelope Valley area has experienced subsidence in the past due to extensive groundwater extraction. Subsidence in the project area could damage levee stability and create flooding hazards. Other geologic hazards, such as presence of faults and unstable soils will be discussed in the EIR. Furthermore, construction and/or operation of a tunnel to convey recycled water to the Santa Clara River may alter landforms and mountains. The EIR will evaluate potential geologic impacts and identify appropriate mitigation measures to minimize such impacts.

5.9 Air Quality and Odor

The air quality impacts of construction and operational activities such as earthwork, worker commute trips, biosolids disposal trips, and agricultural operations will be evaluated. Air emissions from the operation of treatment facilities, including volatile organic compounds and odors, will be

included in the analysis. Project air emissions will be assessed based on the Antelope Valley Air Quality Management District regulations. The project is not anticipated to create significant operational impacts to air quality in the region. However, construction activities could emit significant amounts of nitrogen oxides and dust. Agricultural operations could also generate dust. An expansion of the treatment facilities at the PWRP could result in an increase in odors. The EIR will evaluate potential air quality and odor impacts and identify appropriate mitigation measures to minimize such impacts.

5.10 Noise

The potential of construction and operational activities to generate noise will be assessed, and impacts to sensitive receptors will be evaluated. Construction activities are expected to generate noise during daytime hours. Treatment equipment could generate noise levels hazardous to workers. The EIR will evaluate potential noise impacts and identify appropriate mitigation measures to minimize such impacts.

5.11 Public Services and Utilities

The effects of the project on public services and utilities are not anticipated to be significant. However, expansion of the effluent management system could disrupt public services during construction activities. Indirect effects could include an increased need for public services due to population growth within the region. The EIR will evaluate potential impacts to public services and utilities and identify appropriate mitigation measures to minimize such impacts.

5.12 Recreational Facilities

The project is not expected to require the construction or expansion of recreational facilities, or to increase use of nearby recreational facilities, thereby causing deterioration to substantially occur or be accelerated. The EIR will evaluate potential impacts to recreational facilities and identify appropriate mitigation measures to minimize such impacts.

5.13 Population and Housing/Secondary Effects of Growth

The effects of the expanded treatment capacity at the LWRP will be evaluated with respect to local population and housing. Impacts to housing within the lands to be acquired will be addressed. It is not anticipated that the project would promote population growth, rather the project would accommodate existing growth projections developed by SCAG. The secondary effects of growth will be considered, including air impacts, traffic impacts, biological impacts, and open space impacts. The EIR will evaluate potential population/housing and secondary effects of growth impacts and identify appropriate mitigation measures to minimize such impacts.

5.14 Hazardous Materials

Hazardous materials storage and handling practices could impact worker and public safety. The operating practices for the PWRP as well as the agricultural operations will be assessed to determine potential public health impacts from hazardous materials. The EIR will evaluate potential hazardous materials impacts and identify appropriate mitigation measures to minimize such impacts.

5.15 Public Safety

Impacts to public safety from the proposed project could include bird air strike hazards, traffic hazards, and levee failures. These issues will be assessed with respect to local residents, land uses, and air space uses. The EIR will evaluate potential impacts to public safety and identify appropriate mitigation measures to minimize such impacts.

5.16 Mineral Resources

Use of local rock/gravel quarries will be investigated for effluent management purposes. Investigation will focus primarily on quarries that are no longer economically viable for production of rock and gravel, therefore, loss of mineral resources would be minimal. The EIR will evaluate potential impacts to mineral resources and identify appropriate mitigation measures to minimize such impacts.

5.17 Socio-Economic Resources

Impacts of the project to the local economy will be evaluated. Costs associated with the project alternatives will be compared and summarized. Placement of project facilities will be assessed with respect to environmental justice. A market study may be conducted in order to assess the impact of production of additional fodder crops.