

6.0 OTHER CEQA CONSIDERATIONS

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires that all phases of a project must be considered when evaluating its impact 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 impacts of the proposed project, (5) mitigation measures proposed to minimize significant effects, and (6) alternatives to the proposed project.

6.1 SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT

Table 2-1, Summary of Impacts and Mitigation Measures, contained in Chapter 2.0 *Summary* of this Program EIR, and Sections 4.1 through 4.13 of this Program EIR, provide a comprehensive identification of the proposed project's environmental effects, including the level of significance both before and after mitigation.

6.2 SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Implementation of the proposed project would result in the following unavoidable significant and project-related and/or cumulative impacts:

- Air Quality – Construction activities associated with the proposed project would contribute to an existing or projected air quality violation, operational activities would result in a significant and unavoidable, the proposed project would contribute to a short-term cumulative effect for construction, as well as long term operational cumulative effects
- Traffic and Parking – Under the existing General Plan level of service standard, significant impacts would occur at one intersection in the AM peak hour and five intersections in the PM peak hour; and
- Utilities – Construction debris associated with the proposed project would exceed the daily intake capacity at the local landfill.

6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

Section 15126.2(c) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project. Specifically, Section 15126.2(c) states:

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. Irreversible commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if any of the following would occur:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Resources that will be permanently and continually consumed by the proposed project's implementation include water, electricity, natural gas, and fossil fuels; however, the amount and rate of consumption of these resources would not result in significant environmental impacts related to the unnecessary, inefficient, or wasteful use of resources. In addition, construction activities related to the proposed project would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobile and construction equipment.

With respect to operation activities, compliance with all applicable building codes, as well as project mitigation measures or project requirements, would ensure that all natural resources are conserved or recycled to the maximum extent feasible. It is also possible that new technologies or systems will emerge, or will become more cost-effective or user-friendly, that will further reduce the project site's reliance upon nonrenewable natural resources; however, even with implementation of conservation measures consumption of natural resources would generally increase with implementation of the proposed project.

In addition, a long-term increase in the demand for electrical and natural gas resources would occur. However, the proposed project would not involve wasteful or unjustifiable use of energy or other resources, and energy conservation efforts could also occur with new construction. In addition, new development associated with the proposed project will be constructed and operated in accordance with specifications contained in Title 24 CCR. Therefore, the use of energy on-site would occur in an efficient manner.

6.4 GROWTH INDUCING IMPACTS

Section 15125.2(d) of the CEQA Guidelines requires that growth inducing impacts of a proposed project be considered. Growth inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental or of little significance to the environment. As analyzed in Section 4.9 *Population, Housing and Employment*, the population, housing and employment associated with the proposed project would be consistent with the growth anticipated for SCAG's San Bernardino Subregion.

The proposed project would not remove impediments to growth. The area surrounding the project site is already developed with commercial, industrial and residential uses. In addition, the proposed project may help accommodate a portion of anticipated growth. With regard to infrastructure-induced population growth, all roadway improvements planned for the proposed project, or as mitigation, are intended to provide for better circulation flows throughout the area or to improve pedestrian safety and would not open any large undeveloped areas for new use. Utility and other infrastructure upgrades are also intended

to meet project-related demand. The proposed project's demand for commercial goods and services would be met by new retail, services and community facilities and by existing retail, service and other resources already located within proximity to the project site. In conclusion, the proposed project is expected to satisfy a portion of the unmet population growth. The proposed project would also be consistent with the growth forecast for the San Bernardino Subregion and would help achieve the City's required housing units under the Regional Housing Needs Assessment (RHNS) and certified Housing Element. The proposed project would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of vehicle miles traveled.