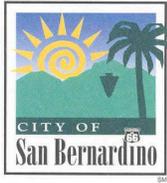


**SECTION 4.0**  
**BASIS OF CUMULATIVE ANALYSIS**

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## 4.0 BASIS OF CUMULATIVE ANALYSIS

### 4.1 INTRODUCTION

*CEQA Guidelines* Section 15355 defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts . . .” The following elements are necessary in an adequate discussion of cumulative impacts, as noted in *CEQA Guidelines* Sections 15130(b) through 15130(e).

(b) *The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other project contribute rather than the attributes of other projects which do not contribute to the cumulative impact. The following elements are necessary to an adequate discussion of significant cumulative impacts:*

1. *Either:*

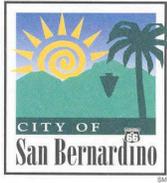
- a. *A list of past, present and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or*
- b. *A summary of projections contained in an adopted General Plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or areawide conditions contributing to the cumulative impact.*

2. *When utilizing a list, as suggested in paragraph (1) of subdivision (b), factors to consider when determining whether to include a related project should include the nature of each environmental resources being examined, the location of the project and its type. Location may be important, for example, when water quality impacts are at issue since projects outside the watershed would probably not contribute to a cumulative effect. Project type may be important, for example, when the impact is specialized, such as a particular air pollutant or mode of traffic.*

3. *Lead agencies should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used.*

4. *A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available; and*

5. *A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable, feasible options for mitigating or avoiding the project’s contribution to any significant cumulative effects.*



- (c) *With some projects, the only feasible mitigation for cumulative impacts may involve the adoption of ordinances or regulations rather than the imposition of conditions on a project-by-project basis.*
- (d) *Previously approved land use documents such as general plans, specific plans, and local coastal plans may be used in cumulative impact analysis. A pertinent discussion of cumulative impacts contained in one or more previously certified EIRs may be incorporated by reference pursuant to the provisions for tiering and program EIRs. No further cumulative impact analysis is required when a project is consistent with a general, specific, master or comparable programmatic plan where the lead agency determines that the regional or areawide cumulative impacts of the proposed project have already been adequately addressed, as defined in Section 15152(f), in a certified EIR for that plan.*
- (e) *If a cumulative impact was adequately addressed in a prior EIR for a community plan, zoning action, or general plan, and the project is consistent with that plan or action, then an EIR for such a project should not further analyze that cumulative impact, as provided by Section 15183(j).*

## 4.2 CUMULATIVE ANALYSIS IN THIS EIR

Cumulative impacts may be discussed in terms of buildout of the San Bernardino General Plan, in combination with impacts anticipated for future development (including approved and planned development within the Merged Area and surrounding affected area), or impacts associated with growth within the region. The geographic area for each impact varies, depending on the nature of the impact, whether it is regional, such as air quality, or local, such as noise.

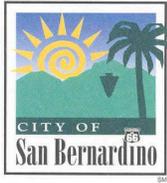
Quantification can be difficult for cumulative impacts, as it requires speculative estimates of impacts including, but not limited to the following: the geographic diversity of impacts (impacts of future development may affect different areas); variations in time of impacts; and changes in data for buildout projections following subsequent approvals. However, every attempt has been made herein to make sound qualitative judgments of the combined effects of, and relationship between, land uses and potential impacts.

In compliance with *CEQA Guidelines* Section 15130(1)(d), this section of the EIR describes the environmental effects of the proposed project in combination with the effects of City buildout, as forecasted in the San Bernardino General Plan.

The City of San Bernardino General Plan buildout to the maximum levels is not anticipated to occur and was not used as a basis for buildout projections. Assuming average buildout levels, the General Plan accommodates a total of 95,664 total units, which includes 82,714 dwelling units in the incorporated City and 12,950 dwelling units in the City's sphere of influence. Based on a factor of 3.340 persons per household, the projected population at buildout for the entire planning area would be approximately 319,241 people, which includes 276,264 persons in the City and 42,976 persons in the City's sphere of influence (SOI). Assuming the vacancy factor of 11.3 percent from the 2000 Census, there could be 84,854 households in the existing City limits at buildout.<sup>1</sup>

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<sup>1</sup> Final San Bernardino General Plan Update and Associated Specific Plans Environmental Impact Report, prepared by The Planning Center, dated September 30, 2005.



Within the total planning area, the General Plan land use plan provides for a total of 3,995 acres of commercial and office uses, including 257 acres of mixed use development, and 6,065 acres of general and light industrial uses. At buildout using the adjusted intensity factors (FARs), the land use plan could generate 355,629 jobs in the total planning area and 338,712 jobs in the existing jurisdictional boundaries.<sup>2</sup>

The buildout projects for population, households, and employment for the City are greater than those projected by SCAG to occur in the year 2025; refer to Table 4-1, Comparison of SCAG 2025 and General Plan Buildout Projections.

**Table 4-1  
Comparison of SCAG 2025 and General Plan Buildout Projections**

	SCAG Projections for City of San Bernardino		Proposed General Plan Buildout Projections	
	2000	2025	City Only	City + Sphere
Population	185,772	212,404	276,264	319,241
Household	56,341	64,440	73,367	84,854
Employment	81,115	131,943	338,712	355,629
Jobs-to-household Ratio	1.44	2.05	4.62	4.19

Sources: *Final San Bernardino General Plan Update and Associated Specific Plans Environmental Impact Report*, Section 5.11 Population and Housing, Table 5.11-3, Page 5.11-5, prepared by The Planning Center, dated September 30, 2005.

In order to make a comparison of General Plan buildout to existing employment conditions, the 2000 employment figures from SCAG were used. The number of jobs projected at buildout of the General Plan is significantly higher at buildout than was assumed by SCAG in the year 2000; refer to Table 4-1. The closure of Norton Air Force Base in 1994 can be attributed to this by the loss of thousands of jobs. The buildout of the General Plan assumes reuse of the airport. The jobs-to-household ratio is also substantially higher at buildout than is projected by SCAG to occur in the year 2025; refer to Table 4-1. This is not a direct comparison as buildout is not linked to a timeline but instead represents ultimate development of the City. By achieving a very jobs-rich 4.19 jobs-to-household ratio, the General Plan benefits the overall County and subregional jobs-to-housing balance. This reflects the desire to continue to be a center of employment and build upon the existing concentration of government offices, higher educational institutions, and improve the airport and surrounding area. Given that employees will not necessarily live and work within the area, the concentration of jobs in the City will help more workers in the area live and work within the County and subregion, which will help address the minor imbalance at the county and subregional levels.<sup>3</sup>

The San Bernardino Merged Area A Merger and Amendments proposes to merge seven of the San Bernardino Economic Development Agency’s (EDA) existing redevelopment project areas into one are encompassing a total of 2,823 acres. The proposed project would result in the addition of 1,833 dwelling units and 6,200,590 square feet of non-residential development. The residents within the Project Area receive public services from the public agencies discussed in Section 5.12 through Section 5.19.

<sup>2</sup> Final San Bernardino General Plan Update and Associated Specific Plans Environmental Impact Report, prepared by The Planning Center, dated September 30, 2005.  
<sup>3</sup> Ibid.



## San Bernardino Merged Area A – Merger and Amendments Program Environmental Impact Report

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