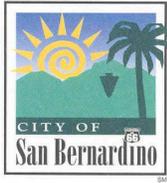


SECTION 9.0
SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT
BE AVOIDED IF THE PROPOSED ACTION IS IMPLEMENTED



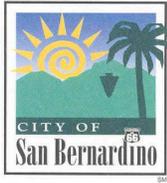
9.0 SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED ACTION IS IMPLEMENTED

CEQA Guidelines Section 15126(b) requires an EIR to “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.”

Section 5.0 of this EIR provides a description of the potential environmental impacts of the proposed project and recommends *General Plan* goals and policies as well as mitigation measures to reduce impacts to a less than significant level, where possible. After implementation of the recommended goals, policies, and mitigation measures, most of the potentially significant impacts associated with the proposed project would be reduced to less than significant levels. However, the impacts listed below could not be feasibly mitigated and would result in a significant unavoidable impact associated with approval of the proposed project.

AIR QUALITY

- **Construction-Related Emissions** – Due to the magnitude of project-related emissions associated with future development and infrastructure projects facilitated by the proposed project, construction-related emissions are considered significant and unavoidable.
- **Operational Emissions** – During the operational phase, potential development within the Project Area would result in a net increase in regional emissions of ROG, NO_x, SO₂, CO, PM₁₀, and PM_{2.5} from the operation of both stationary and mobile sources. Mitigation measures and *General Plan* policies identified above would reduce the potential air quality impacts to the degree feasible, but emissions are anticipated to remain above SCAQMD significance thresholds. Therefore, operation of the proposed project would have a significant and unavoidable impact.
- **Cumulative Construction-Related Emissions** – The associated Implementation Action requires Best Available Control Measures to be incorporated to reduce construction emissions below daily emissions standards established by the SCAQMD. These Best Available Control Measures include procedures to control emissions of particulate matter, ozone, and NO_x (an ozone precursor). However, even with implementation of the policies and implementation actions, cumulative construction-related emissions would not be reduced to a less than significant level. Thus, significant and unavoidable impacts would occur in this regard.
- **Cumulative Operational Emissions** – Many of the individual projects would be small and generate mobile and stationary emissions that do not exceed the SCAQMD’s recommended thresholds of significance. With regard to daily operational emissions and



the cumulative net increase of any criteria pollutant for which the region is nonattainment, this is considered to be a potentially significant cumulative impact, due to nonattainment of O₃ and PM₁₀, and PM_{2.5} standards in the Basin. The contribution of daily operational emissions from the growth associated with the proposed project could be cumulatively considerable. This cumulative impact is considered to be significant and unavoidable.

- **Cumulative GHG Emissions** – When considering the proposed project as a whole, proposed amount of development under the proposed project would be expected to produce a significant amount of GHG emissions. Many of the individual projects would be small and generate nominal amounts of GHGs. However, as global climate change is cumulatively considerable, future project GHG contributions associated with the proposed project could result in a significant cumulative impact. Although the proposed project would be required to adhere to the previously identified *General Plan* policies regarding vehicle emissions reductions and energy and water efficiency, it would be too speculative to quantify GHG emissions and reductions from the proposed project, as project specific details are unknown at this time. Therefore, the contribution of GHG emissions from the growth associated with the proposed project could be cumulatively considerable. This cumulative impact is considered to be significant and unavoidable.

TRAFFIC

- **Project and Cumulative Traffic** – Trips associated with the proposed project and cumulative development within the City would impact levels of service on the area roadway system. These impacts have been determined to be significant and unavoidable, even with compliance with the *General Plan* goals and policies, and the recommended circulation improvements identified in the *General Plan* Circulation Element and *General Plan EIR*. To assist in implementing circulation improvements identified in the *General Plan* Circulation Element, the City established development impact fees for both local and regional circulation improvements. All future developments that occur within the City and the Project Area would be required to pay these fees. Payment of these fees effectively mitigates the impacts associated with development projects in the City. However, since the circulation improvements may not be constructed until some time after the fees are paid, impacts remain significant. In addition, there may be instances where improvements are shared by other jurisdictions (i.e. Caltrans, City of Redlands, County of San Bernardino, etc.), which may affect the ability to construct the proposed improvements at the time the impact occurs. While these impacts are mitigable, it is the timing of when the mitigation would occur that provides the basis for the significant unavoidable impact determination.