

5.0 OTHER CEQA REQUIRED ANALYSIS

5.1 INTRODUCTION

This section includes consideration and discussion of other project-related impacts that must be evaluated in an EIR as described in CEQA Guidelines section 15126.2 and section 15130. These include the following:

- Cumulative Impacts must be discussed when project-related impacts are or can be mitigated to less than significant, but, when combined with other reasonably foreseeable projects, can be cumulatively considerable.
- Growth Inducing Impacts must be discussed with regard to the way in which the Proposed Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding area.
- Significant Irreversible Environmental Changes Which Would be Involved if the Proposed Project is Implemented must be discussed when the project includes future commitments to non-renewable resources either during construction or operation. Irretrievable commitments of non-renewable resources must be evaluated to assure that the consumption can be justified. Irreversible changes may also result from environmental accidents associated with project operations.

5.2 CUMULATIVE IMPACT ANALYSIS

5.2.1 Purpose

This section discusses the potential cumulative impacts to the environment that may result from the implementation of the proposed Highland Marketplace project when considered with other planned or reasonably foreseeable projects. CEQA Guidelines, Section 15130, provides the following guidance concerning the format and content of the cumulative impacts analysis:

- (a) (1)...a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts.
- (2) When the combined cumulative impact associated with the project's incremental effect and the effect of other projects is not significant, the EIR shall briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR.

When discussing cumulative impacts:

- (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 the standards of practicability and reasonableness. The following elements are necessary to an adequate discussion of 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 area-wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.

A list of related projects which are pending, approved, or under construction was compiled by the City within an approximately three-mile radius of the Proposed Project site. This radius encompasses lands within the City of San Bernardino, the City of Highland, and unincorporated areas of the County of San Bernardino. These projects are identified in Table 5-1 and their location is shown on Figure 5-1. The three-mile radius is an approximate area defined to identify other projects that are interrelated and share direct and indirect impacts both individually and cumulatively. However some cumulative analyses such as biology and air quality are assessed and analyzed on a regional level. Potential Cumulative Impacts for Air Quality, Greenhouse Gasses, and Traffic are analyzed on both a project and cumulative basis.

The combined cumulative projects include 448 residential lots and approximately 596,515 square feet of commercial space, 1,116,317 square feet of manufacturing and warehouse space, 12,556 square feet of office space, and 878,758 square feet of industrial space not including the Proposed Project of approximately 107,979 square-feet of commercial uses. There were other past, present, and probable future projects within the 3-mile radius that are not included in the table for analysis, either due to the small scale of the project or the type of land use would not have added to any cumulative impacts.

5.2.2 Standards of Significance

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 Guidelines further state:

- a. The individual effects may be changes resulting from a single project or a number of separate projects.
- b. The cumulative impact from several projects is the change in the environment, which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

**Table 5-1
Cumulative Projects**

Map	Jurisdiction	Location	Description
1	City of San Bernardino	Northeast corner of Waterman Avenue and Olive Street	450 units mixed-income residential, and 75-unit senior housing and a 60,000 – 80,000 sq. ft. full service community center
2	City of San Bernardino	South side of Highland Avenue, between Valaria Drive and Robinson Road.	3-story 52,349 square-foot/100 rooms hotel
3	City of San Bernardino	1910 E. Central Avenue.	951,000 sq. ft. warehouse building
4	City of San Bernardino	NEC of Highland Ave. & Boulder Ave	40,631 sq ft expansion to existing Wal-Mart retail
5	City of San Bernardino	Rialto Avenue 800 feet east of Tippecanoe Avenue.	94 Dwelling Units
6	City of San Bernardino	NEC of Sterling Ave. and 3rd Street.	27,129 sq ft office and 19,943 sq ft industrial
7	City of San Bernardino	1955 E. Marshall Avenue	11,000 sq.ft. office building

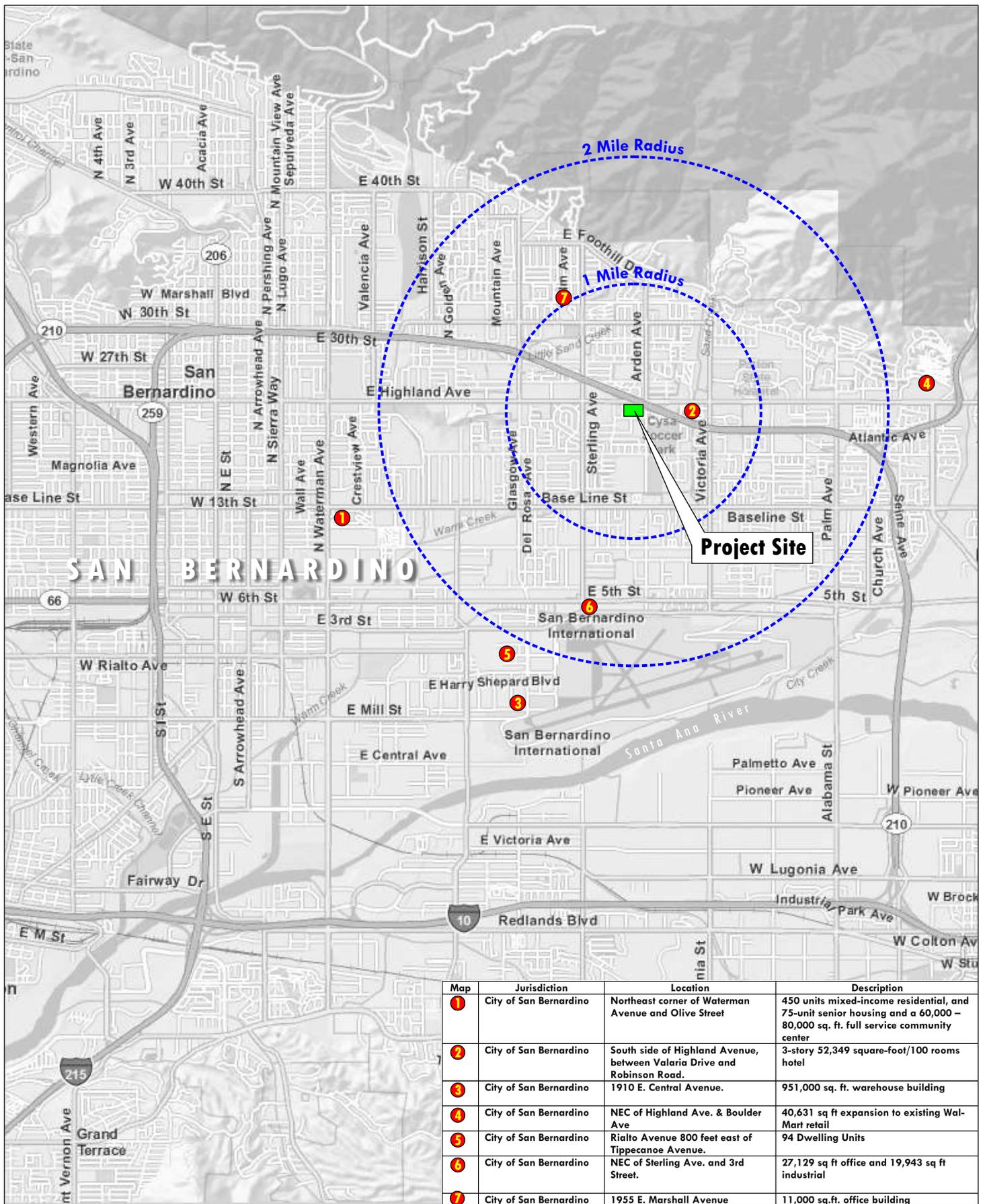
Chapter 4 of the Draft EIR includes an assessment of the Proposed Project’s potential to impact environmental resources in the areas of:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Traffic and Circulation
- Greenhouse Gases
- Economic Impact – Urban Decay

The analyses presented in Chapter 4 of the Draft EIR conclude that the Proposed Project’s impacts determined to be potentially significant before mitigation measures are implemented would occur in the areas of Aesthetics, Air Quality, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, and Traffic and Circulation. All potentially significant impacts are reduced to levels of less than significant with the implementation of mitigation measures.

Cumulative Impacts Considered to be Less than Significant

Aesthetics. The Project Site is located within the City’s Open Space Public/Commercial Recreation (PCR) zoning classification as shown on the City of San Bernardino Zoning Map.



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Miles
Source: B.L.M. 2011.
LILBURN
CORPORATION

LEGEND
1 Pending or Approved Projects

CUMULATIVE PROJECTS
Highland Marketplace EIR
City of San Bernardino, California

Views along Arden Avenue and for residents located on the east side of Arden Avenue would not be significantly changed with implementation of the Proposed Project. Appropriate setbacks and landscaping for the Proposed Project and cumulative projects would provide a buffer to minimize visual impacts. Given the location of the Project Site along Highland Avenue (a viable commercial corridor), freeway access and visibility, the Proposed Project would not appear out of place and would redevelop a once blight site to an aesthetically pleasing neighborhood retail center. None of the other cumulative projects are commercial retail, however a hotel is proposed (Cumulative Project No. 2) along the south side of Highland Avenue east of the Project Site. Cumulatively, aesthetic benefits to the Highland Avenue Corridor would result from these projects.

All the buildings within the Proposed Project would have a contemporary architectural style and would incorporate a number of design elements. The Proposed Project would cumulatively add to the urbanized character of the City and would not be considered a significant impact. The cumulative projects primarily consist of commercial uses that are anticipated to be of similar aesthetic and visual quality. The Proposed Project as well as the cumulative projects are consistent with adopted land use plans and therefore, this would not be a significant cumulative impact.

The impact of nighttime lighting depends on the proximity of sensitive receptors, intensity of the new light sources, and existing ambient lighting combined. Sensitive receptors located in the vicinity of the Project Site include multi-family residential development immediately west of the Project Site boundary, residential development to the east of the Project Site across Arden Avenue, and two schools located just south of the Project Site. Existing nighttime illumination sources include street lights along Highland Avenue and Arden Avenue, security lighting in the residential development areas, traffic signals, surrounding commercial development lighting, and glow from vehicle traffic along Highland Avenue, Arden Avenue and I-210. While the Proposed Project could involve nighttime activities such as late night operation of the drive-thru facilities and gas station that would result in new sources of light, substantial nighttime lighting in the surrounding areas of the Project Site already exist. Addition of new sources of permanent light and glare as a result of implementation of the Proposed Project would not significantly increase ambient lighting in the project vicinity.

Air Quality. Potential Cumulative Impacts related to Air Quality are analyzed on both a project and cumulative basis simultaneously. The Draft EIR Section 4.2 analysis the potential Air Quality impacts associated with the Proposed Project. This Draft EIR Section identifies that only construction related air emissions will exceed the established threshold levels and that these emissions can effectively be reduced to less than significant levels with implementation of Mitigation Measures AQ-1, 2, and 3. Operational air quality emissions are not anticipated to exceed established air quality thresholds and no project related mitigation is required. The Draft EIR Section 4.2 demonstrates that with implementation of Mitigation Measures AQ-1, 2, and 3 the potential impacts to Air Quality both individually and cumulatively would be reduced to a less than significant level.

Biological Resources. The project site does not contain suitable habitat for any rare, threatened or endangered species. Other projects in the vicinity would incrementally increase the use of

currently undeveloped land that could potentially be used by various wildlife species, including rare, threatened or endangered species. However, the City of San Bernardino is largely developed with urban uses and most of the cumulative project sites are already surrounded by development. In addition, project specific mitigation measures for other proposed development within the region would ensure that impacts to biological resources are mitigated. Therefore, cumulative impact to biological resources would not be considered significant.

Cultural Resources. The results of the Phase I Cultural Resource Investigation conducted to address potential cultural, paleontological and archeological impacts for the Proposed Project indicate that the no resources were discovered on the Project Site and the archaeological sensitivity of the project area is considered to be low. According to the City of San Bernardino General Plan Update and Associated Specific Plans Draft EIR (Figure 5.4-2 Archaeological Sensitivities), neither the Project Site nor the cumulative projects identified on Table 5-1 are located in a designated area of concern for Archaeological Resources or in an Urban Archaeological District containing Historical Archaeological Resources. The cumulative projects identified on Table 5-1, would all be required to assess their individual impact upon cultural resources. Since the Project Site does not contain cultural resources the project would not contribute to cumulative impacts relating to cultural, paleontological and archeological resources.

Geology and Soils. According to the geotechnical reports prepared for the Project Site, no known active or potentially active faults pass through the project site. The Proposed Project lies outside of any Alquist Priolo Special Studies Zone and the potential for damage due to direct fault rupture is considered remote. Impacts associated with geology and soils would be site-specific and are either less than significant or can be reduced to less than significant with implementation of the recommended mitigation measures. Regionally, the cumulative projects identified on Table 5-1 could attract an increase in the number of people to an area exposed to potential effects related to geology and soils. However, potentially adverse environmental effects are required to be addressed within the Uniform Building Code. Adherence to the UBC will reduce the potential cumulative impact to less than significant. Therefore, cumulative impacts are considered to be less than significant.

Hazards and Hazardous Materials. The Proposed Project would store, use and dispose of hazardous materials typical of commercial uses and service stations. Certain projects in Table 5-1 include uses that may support industrial and warehousing activities. The transport, use, storage and disposal of hazardous materials would increase incrementally as development continues in the area. However, the Proposed Project and related projects (other than residential) are regulated by local, state and federal agencies for hazardous materials, and must show proof of compliance with all applicable regulations relating to the routine transport, use, or disposal of hazardous materials. Compliance with these regulations would result in cumulatively less than significant impact.

Hydrology and Water Quality. Development of other projects (shown in Table 5-1) would result in an increase in impervious surfaces and increase runoff from these sites into the local and regional storm drain systems. In addition, urban pollutants associated with parking lots, roads, and landscaping, combine with stormwater that ultimately ends up in major watercourses

flowing through the City of San Bernardino. Stormwater requirements administered by the Santa Ana Regional Water Quality Control Board (RWQCB) require individual projects to employ Best Management Practices (BMPs) to control urban runoff from each site during construction. The RWQCB is also responsible for reviewing each project's Water Quality Management Plan (WQMP) for long-term operation and issuing the Waste Discharge Requirements for each project. In addition, individual business owners may also be required to submit Water Quality Management Plans and be issued Waste Discharge Requirements by the RWQCB on an individual basis within larger development projects. Employing BMPs that reduce the potential for storm water discharges to affect water quality have been proven successful when implemented at construction projects. Therefore, this impact would not be cumulatively significant.

Noise. Noise sources associated with the Proposed Project are related to: 1) introduction of new uses to an existing underdeveloped area; and 2) vehicle trips that when combined with traffic generated by other related projects would increase the ambient noise levels in the vicinity. The Draft EIR Section 4.7 discusses both project-specific traffic noise increases as well as cumulative traffic noise increases. The noise analysis shows that the project itself would result in a very minor change in noise levels along all roadways in the area. The increases caused by the project range from 0.1 to 0.9 dB, which would not be discernible. Therefore, the traffic generated by the project would not result in a significant impact. Draft EIR Section 4.7 also shows that cumulative CNEL traffic noise levels are projected to increase up to 2.9 dB over existing conditions. The project contributes insignificantly to these levels. Therefore, is not adding to the cumulative impact.

The noise levels along Highland Avenue, Del Rosa Drive and Sterling Avenue would continue to be high and would increase over existing levels. However, the increase in traffic noise is due to general development in the area, and the Proposed Project would not contribute significantly to this increase. The noise from the I-210 would continue to dominate the noise at the Project Site.

Most of the noise increase that would occur along roadways in the vicinity of the Proposed Project would be due to the regional growth in traffic that would occur independently of the project itself. Therefore, increases in ambient noise in the area could be cumulatively significant. However, the minimization of noise impacts can occur with appropriate project design; both to alleviate noise generation from the project and to alleviate noise impacts to sensitive receptors. Noise barriers would be constructed for all schools, residential areas, and parks that could be impacted by traffic noise from any cumulative projects. Compliance with appropriate City and/or County noise standards, and project-specific mitigation measures if required for any cumulative projects, would result in less than significant cumulative noise related impacts.

Traffic and Circulation. The City of San Bernardino General Plan designates land uses to all areas of the City. The 2030 traffic model includes the zoning for each area of the City and those projects known at the time the traffic model is developed. Mitigation measures in the form of street improvements, internal parking and roadway design, and signals are listed to achieve acceptable levels of service. The City of San Bernardino requires the payment of traffic fees for off-site improvements.

As discussed in the Draft EIR Section 4.8, the traffic impact analysis prepared by Fehr & Peers, in August of 2011, included an analysis of future conditions in opening year (2013) and 2030 with and without the project as well as expected general and cumulative traffic growth in the area. Future traffic projections were interpolated from existing traffic counts and analyzed in conjunction with empirical research conducted by the Transportation Research Board and other authorities in accordance with City of San Bernardino and the San Bernardino Association of Governments Congestion Management Plan analysis requirements. Eleven signalized and unsignalized intersection operations were evaluated using methodologies provided in *Highway Capacity Manual* (HCM 2000) (Transportation Research Board), which is considered the state-of-the-practice methodologies for evaluating intersection operations.

The Draft EIR Section 4.8 concludes that with the improvements on the following intersections, potentially significant traffic impacts on a project-related and cumulative basis would be reduced to a less than significant level:

- I-210 Eastbound Off-Ramp at Highland Avenue
- I-210 Westbound On-Ramp/Arden Avenue at Highland Avenue,
- I-210 Eastbound Off-Ramp at Highland Avenue
- Sterling Avenue/Highland Avenue
- Highland Avenue at Victoria Avenue
- SR-210 Westbound On-Ramp/Arden Avenue at Highland Avenue
- Date Street at Arden Avenue
- SR-210 Eastbound On-Ramp at Arden Avenue

Based upon implementation of the proposed improvements/mitigation measures TC-1 through TC-10, the incremental impacts from the Proposed Project in conjunction with the listed cumulative projects and overall growth, would not contribute to significant cumulative impacts to traffic.

Greenhouse Gases. The Draft EIR Section 4.9 analyses the potential impacts of Greenhouse Gases (GHG) on a regional/cumulative basis. As discussed in this Draft EIR Section, increases in GHG emissions from the Proposed Project when considered in conjunction with the Project Site's previous land use would be below SCAQMD's 3,000 MTCO₂e/yr. threshold of significance and concludes that there are no issues associated with greenhouse gas emissions that have the potential for resulting in significant cumulative impacts. Therefore, the Proposed Project's contribution to this impact is considered to be less than cumulatively considerable

Economic Impact – Urban Decay. As identified in the Draft EIR Section 4.10, there are 38 stores in the categories of Home Improvement, Hardware, Paint, Lumber and Electrical Supplies stores that were included within the Competitive Retail Supply Area (CRSA) defined for the Retail Impact Study prepared for the Proposed Project. Seventeen (17) of these stores are within 5 miles of the Proposed Project's Home Depot. Another 12 stores are identified as within 5 to 10 miles, and the 9 remaining stores are more than 10 miles away from the proposed store. The farthest store from the Project Site and within the CRSA and is located almost 22 miles away in the City of Big Bear Lake.

While it is possible that individual stores may experience either greater or lesser sales per square foot impacts than the averages shown for various distance bands from the Proposed Project's Home Depot store, it is projected that the sales per square foot trends, in conjunction with increases and decreases in the competitive retail supply, would not likely result in substantial and persistent increases in commercial vacancies that would result in Urban Decay. The cumulative project do not include any commercial uses within the categories of Home Improvement, Hardware, Paint, Lumber and Electrical Supplies. Therefore, cumulative impacts to urban decay as a result of the Proposed Project including a Home Depot store would not occur.

When considering the Proposed Project, in conjunction with the other proposed or reasonably foreseeable projects as identified in Table 5-1, the level of significance of projected-related impacts would not incrementally increase for any environmental resource areas. No cumulatively significant impacts would occur.

5.3 GROWTH INDUCING IMPACTS

CEQA Guidelines Section 15126.2(d) requires an evaluation of growth inducing impacts that may result from a Proposed Project. Growth inducing impacts can occur when a Proposed Project places additional stress on a community by directly inducing economic or population growth that would lead to construction of new development projects in the same area as the project.

The proposed Home Depot Shopping Center entails the development of a commercial shopping center with a maximum of 204,720 square feet (SF) of general commercial land uses on approximately 17.37 acres in the northeasterly portion of the City of San Bernardino. The Proposed Project would provide for a greater commercial shopping base both on a local and regional level and would likely reduce the overall vehicle miles driven by providing a local commercial/retail center for the existing and future residences in the area.

The Project Site is located within an urbanized area of the City and was previously developed with multi-family residential units. All public services and utilities were provided to the development and active until the buildings were demolished. Certain infrastructure and utilities remains on-site or adjacent to the site and available for connection. The Proposed Project's demand for public services and utilities is expected to be less than what the demands of the 296 residential units were.

Although the Proposed Project would generate additional jobs during the construction and operation periods, it is expected that those jobs can be filled by the existing labor force in the area. The Proposed Project does not provide infrastructure such as water systems, energy generation, sewer systems, schools, public services, or transportation improvements that could potentially support increased growth in the region. No housing is included as a part of the Proposed Project.

The Proposed Project located within the City of San Bernardino would be consistent with the City's established land use designation and zoning designation for the project site. The Proposed Project would be consistent with the City of San Bernardino General Plan and would be

constructed contiguous with existing urban areas and specifically adjacent to other residential land uses which would not result in incompatible land uses in the area.

5.4 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES WHICH WOULD BE CAUSED BY THE PROPOSED PROJECT SHOULD IT BE IMPLEMENTED

CEQA Guidelines Section 15126.2(c) states significant irreversible environmental changes to nonrenewable resources which would be caused by the Proposed Project should it be implemented must be addressed.

In the case of the Proposed Project, implementation would include construction activities that would entail the commitment of nonrenewable and/or slowly renewable energy resources; human resources; and/or natural resources including but not limited to lumber and other forest products, sand and gravel, asphalt, steel, copper, lead, other metal, and water. The Proposed Project would also entail an increased commitment of social services and public maintenance services (e.g., police, fire, schools, libraries, sewer, water, solid waste, and natural gas services) that would also be required. The energy and social service commitments would be long-term obligations

From a large scale perspective, the Proposed Project is considered a long-term irreversible commitment of the use of land. After the 50- to 75-year structural lifespan of new building construction is reached however, it is improbable that the project area would revert to its current condition due to the large capital investment that would already have been committed.

An increased commitment of social services and public maintenance services (e.g., police, fire, schools, libraries, and sewer and water services) would also be required. The public maintenance and social service commitments would be considered a long-term obligation in view of the low likelihood of returning the land to its current condition once it has been redeveloped.

An increase in vehicle trips would accompany project-related population growth. Over the long term, emissions associated with such vehicle trips would continue to contribute to the South Coast Air Basin's nonattainment designation for ozone. Given the low likelihood that the land would revert to lower intensity uses or to its current form, the Proposed Project would generally commit future generations to these environmental changes.

There are no secondary resource impacts expected to result from growth and development associated with the Proposed Project. The proposed development would not result in the extension of infrastructure (sewer, water or roads) into areas not previously developed.