

6. Significant Unavoidable Adverse Impacts

Pursuant to Section 15126.2(b) of the CEQA Guidelines, this EIR considers the significant environmental effects which cannot be avoided if the proposed project is implemented. At the end of Chapter 1, *Executive Summary*, is a table that summarizes the impacts, mitigation measures, and levels of significance before and after mitigation. Mitigation measures would reduce the level of impact, but the following impacts would remain significant, unavoidable, and adverse after mitigation measures are applied:

6.1 AIR QUALITY

- **Impact AQ-1:** The project has the potential to result in or cause National AAQS or California AAQS violations. Construction-source emissions would exceed the applicable SCAQMD regional thresholds for NO_x. Operational-source emissions would exceed the applicable SCAQMD regional thresholds for NO_x, VOCs, and PM₁₀. Additionally, the project proposes a General Plan Amendment to industrial warehousing, and the amendment is not in the current AQMP. Therefore, the project would have the potential to conflict with the AQMP, and impacts are considered significant and unavoidable.
- **Impact AQ-2:** After implementation of MM AQ-1 through AQ-3, project construction-source emissions would still potentially exceed the applicable SCAQMD thresholds for VOCs and NO_x due to the potential of construction overlapping. No feasible mitigation measures exist that would reduce these emissions to levels that are less than significant. Moreover, the majority of construction-source NO_x emissions would be generated from the hauling of soil during grading activities by trucks that cannot be mitigated. Since the City does not have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce NO_x emissions to levels that are less than significant; thus, these emissions are considered significant and unavoidable.

Furthermore, even with implementation of MM AQ-4 through MM AQ-6 and PDF-AQ-1 through PDF-AQ-4, project operational emissions would still exceed regional thresholds of significance established by the SCAQMD for emissions of VOCs, NO_x, and PM₁₀. It is important to note that the majority of VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other industrial consumer products. Therefore, the project applicant cannot meaningfully control the use of consumer products by future building users via mitigation; thus, VOC emissions are considered significant and unavoidable, as no feasible mitigation measure exists that would reduce this impact to less than significant levels. Additionally, approximately 87 percent of all operational-source emissions (by weight) would be generated by project mobile sources (traffic). Neither the project applicant nor the lead agency (City of Jurupa Valley) can substantively or materially reduce project mobile-source emissions beyond the recommended mitigation measures. Therefore, project operational-source VOCs, NO_x, and PM₁₀ emissions exceedances of applicable SCAQMD regional thresholds would be considered significant and unavoidable.

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6.2 GREENHOUSE GAS EMISSIONS

- **Impact GHG-1.** Development in accordance with the proposed project would generate GHG emissions in exceedance of SCAQMD's threshold for industrial uses. Implementation of project design features PDF-GHG-1 through PDF-GHG-8 as well as PDF-AQ-1 through PDF-AQ-2 would reduce GHG emissions to the extent feasible. Specifically, PDF-GHG-2 would require use of 2010 or newer trucks. Implementation of air quality Mitigation Measures AQ-1 through AQ-6 would also help to reduce GHG emissions. No feasible mitigation measures exist that would reduce these emissions to levels that are less than significant. Impact GHG-1 would remain significant and unavoidable.
- **Impact GHG-2.** The project would not conflict with or impede implementation of applicable plans, policies, and regulations adopted to reduce GHG emissions. While the project is consistent with applicable Scoping Plan and WRCOG Climate Action Plan goals and policies and incorporates project design features that would further minimize GHG emissions, it would exceed the numeric threshold and result in a cumulatively considerable impact with respect to GHG emissions (see Impact GHG-1 above). Impact GHG-2 is significant and unavoidable.

6.3 TRANSPORTATION AND TRAFFIC

- **Impact T-1: Existing Plus Project Scenario.** The proposed project is forecast to result in less than significant traffic impacts under the "Existing Plus Project" conditions at the study intersections and segments with improvements identified in PDF T-1 through PDF T-8 and Mitigation Measures T-1 through T-16. However, several of the intersection improvements are not fully funded and/or are under another agency's jurisdiction. Therefore, several of the study intersections are projected to operate at an unacceptable level of service (LOS E or worse) during the morning and evening peak hours, and Impact T-1 would remain significant and unavoidable on a project-specific and cumulative basis.
- **Impact T-1: Near-Term (2020) Project Scenario.** The proposed project is forecast to result in less than significant traffic impacts under the "Near Term Year 2020" conditions at the study intersections and segments with improvements identified in PDF T-1 through PDF T-8 and Mitigation Measures T-17 through T-35. However, several of the intersection improvements are not fully funded and/or are under another agency's jurisdiction. Therefore, several of the study intersections are projected to operate at an unacceptable level of service (LOS E or worse) during the morning and evening peak hours, and Impact T-1 would remain significant and unavoidable on a project-specific and cumulative basis.
- **Impact T-1: Horizon Year (2035) Project Scenario.** The proposed project is forecast to result in less than significant traffic impacts under the "Horizon Year 2035" conditions at the study intersections and segments with improvements identified in PDF T-1 through PDF T-8 and Mitigation Measures T-36 through T-50. However, several of the intersection improvements are not fully funded and/or are under another agency's jurisdiction. Therefore, several of the study intersections are projected to operate at an unacceptable level of service (LOS E or worse) during the morning and evening peak hours, and Impact T-1 would remain significant and unavoidable on a project-specific and cumulative basis.

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- **Impact T-1.** Impacts to Riverside County and San Bernardino County CMP segments were analyzed in accordance with CMP requirements and LOS standards as identified in Impact T-1. As identified above, the proposed project would result in significant and unavoidable impacts to intersections and segments, including segments that are in the Riverside County and San Bernardino County CMP. For Caltrans impacts, widening the I-10 and the SR-60 in both directions with one additional travel lane would accommodate the projected Year 2035 traffic conditions. Additionally, future potential interchange reconfigurations may be beneficial in reducing LOS. However, these improvements are under the sole jurisdiction of Caltrans. Therefore, impacts to Caltrans' facilities are significant and unavoidable, and Impact T-2 would remain significant and unavoidable on a project-specific and cumulative basis.

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