

## 6. Significant Unavoidable Adverse Impacts

---

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:

### Agricultural Resources

- **Impact 5.1-1:** The proposed project would convert Farmland to non-agricultural use. No feasible mitigation measures have been identified that would mitigate agricultural resources to below a level of significance. Impacts would remain *significant and unavoidable*.

### Air Quality

- **Impact 5.2-1:** Construction activities associated with the proposed project would generate short-term VOC and NOX emissions in exceedance of SCAQMD's threshold criteria. Implementation of Mitigation Measure AQ-1 would require off-road construction equipment of 50 horsepower or greater used for Phase 1 rough grading activities to be fitted with engines that meet the EPA's Tier 4 Interim emissions standards. In addition, implementation of Mitigation Measures AQ-2 through AQ-4 would require use of low VOC interior and exterior paints for the proposed buildings and for the surface parking lots. As shown in Table 5.2-18 incorporation of Mitigations Measures AQ-1 through AQ-4 would reduce project-related construction emissions of VOC and NO<sub>x</sub> to below their respective significance thresholds. Therefore, Impact 5.2-1 would be reduced to less than significant. However, because NOX emissions with mitigation measure would result in 99 pounds per day, which is close to the SCAQMD threshold of 100 pounds per day, this impact is conservatively considered *significant and unavoidable*.
- **Impact 5.2-2:** Long-term operation of the project would generate emissions in exceedance of SCAQMD's threshold criteria and would cumulatively contribute to the nonattainment designations of the air basin. Implementation of Mitigation Measure AQ-5 would limit off-road equipment used in daily operations to be electric-powered only. As shown in Table 5.2-19, implementation of Mitigation Measures AQ-2 through AQ-10 would reduce emissions to the extent possible. However, project-related operation phase emissions would still exceed the VOC and NOX regional significance thresholds. Therefore, Impact 5.2-2 would remain *significant and unavoidable*.
- **Impact 5.2-7:** The proposed project would be inconsistent with the applicable air quality plan. Compliance with PPP AIR-1 through PPP AIR-4 and incorporation of Mitigation Measures AQ-5 through AQ-10 would contribute in minimizing criteria air pollutant emissions from operation of the proposed project. However, as shown in Table 5.2-19, even with incorporation of mitigation, project-related operation-phase activities would still result in VOC and NOX emissions exceeding the SCAQMD

## 6. Significant Unavoidable Adverse Impacts

regional significance thresholds. Thus, the proposed project would continue to be inconsistent with the AQMP. Therefore, Impact 5.2-7 would remain *significant and unavoidable*.

### Greenhouse Gas Emissions

- **Impact 5.7-1:** Operation of the proposed project would generate emissions from mobile and other sources that would exceed the bright-line significance threshold and would have a significant impact on the environment. Table 5.7-8 shows the project's emissions inventory with incorporation of mitigation. Specifically, incorporation of Mitigation Measure AQ-5, which would limit all off-road equipment used for daily operations to electric-powered equipment only, would reduce emissions by 285 MTCO<sub>2</sub>e/yr. Furthermore, implementation of Mitigation Measures AQ-6, GHG-1, and GHG-2 would reduce GHG emissions to the extent feasible. However, because the number of people who may utilize alternative modes of transportation and the number of trucks that would utilize electric-powered TRUs is uncertain, the total reductions that the services provided through these mitigation measures would provide cannot be quantified. Overall, incorporation of mitigation would reduce project-related emissions by about 1.1 percent (i.e., 285 MTCO<sub>2</sub>e/yr) from 26,906 MTCO<sub>2</sub>e/yr down to 26,621 MTCO<sub>2</sub>e/yr. However, neither the project applicant nor the lead agency (City of Ontario) can substantively or materially affect reductions in project mobile-source emissions beyond the regulatory requirements. Because the net change in emissions of 8,311 MTCO<sub>2</sub>e/yr would still exceed 3,000 MTCO<sub>2</sub>e/yr, Impact 5.7-1 would remain *significant and unavoidable*.
- **Impact 5.7-2:** Implementation of the proposed project would conflict with the City's Community Climate Action Plan. Implementation of Mitigation Measure GHG-3 would require future individual projects accommodated under the proposed project to be designed to achieve at least 100 points on the City's GHG Screening Threshold Table. This measure would ensure that future individual projects are consistent with the City's Community CAP and would reduce Impact 5.7-2 to less than significant. However, there is the potential for the project to generate GHG emissions that would result in significant impacts on the environment. Pending adoption of the City CAP update; a determination that the City CAP as updated is consistent with applicable State and regional GHG emissions reduction plans; and a determination that the proposed project is consistent with the CAP as updated, the potential for project GHG emissions to result in a significant impact on the environment is conservatively considered to be a *significant and unavoidable* impact.

### Transportation

- **Impact 5.14-1:** The proposed project would have a significant impact on 7 intersections in the Existing plus Project scenario, 13 intersections in the Opening Year Cumulative with Project scenario, and 31 intersections in the Horizon Year with Project scenario. Additionally, the project would have a significant impact to 1 freeway segment in the Existing plus Project scenario, 6 freeway ramps/segments in the Opening Year Cumulative with Project scenario, and 9 freeway ramps/segments in the Horizon Year with Project scenario. With the implementation of mitigation measure TRAF-1, which requires contribution of fair-share fees. Table 5-4 in the TIA shows that the identified improvements would mitigate traffic impacts at the identified intersections. However, many intersections are under the jurisdiction of Caltrans

## 6. Significant Unavoidable Adverse Impacts

or the City of Chino, and the City of Ontario cannot guarantee implementation of the improvements within these jurisdictions. Also, the improvements identified under TRAF-1 within the City of Ontario are not part of an adopted plan or program that will guarantee construction of the improvements within a specified period. As a result, traffic impacts would be *significant and unavoidable*.

- **Impact 5.14-3:** The proposed project would not reduce total VMT/SP by at least 15 percent compared to the citywide average. unmitigated project VMT/SP (Total VMT/SP) would exceed applicable thresholds. The project would implement TDM measures (Mitigation Measure TRAF-3) that could potentially reduce Automobile VMT/SP impacts to levels that would be less than significant. Even with implementation of TDM measures, Total VMT/SP impacts could not be reduced to levels that would be less than significant. In any case, the efficacy of TDM measures and reduction of VMT impacts below thresholds cannot be assured at this concept stage of project development. The project VMT impact is therefore considered *significant and unavoidable*.

## 6. Significant Unavoidable Adverse Impacts

*This page intentionally left blank.*