SECTION 5.0: SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES AND UNAVOIDABLE ADVERSE IMPACTS

5.1 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2 (c) of the CEQA Guidelines states that the analysis of the project's environmental impacts should include the "significant irreversible environmental changes which would be involved in the proposed project should it be implemented". The construction and operation of the proposed Wal-Mart Supercenter would result in certain irreversible environmental changes. These include:

- The redevelopment of 16.29 acres of land would result in the demolition of existing structures. Once demolished, the existing structures cannot be brought back to the site in their original conditions. Only the replacement of those demolished with new on-site improvements, commercial structures, and infrastructure systems may occur. These structures are not considered historic and their demolition would not affect cultural resources in the area.
- The construction of the project would entail the commitment of non-renewable energy and natural resources, which cannot be removed thereafter. This commitment of energy, natural resources, and building materials would be proportionate with that of other similar development projects of similar land use and size. Labor would also be committed for the demolition of existing buildings and construction of the building and infrastructure systems necessary to implement the proposed development.
- Once constructed, use of the commercial store on the site would entail a commitment of energy resources in the form of fuel and electricity. This commitment would be a long-term obligation, since the proposed structure is likely to have a useful life of 40 years or more. However, as discussed in Section 4.14, *Utilities* of this EIR, the impacts of future energy consumption by the project are not considered significant adverse environmental impacts.
- The site is relatively flat and the project is expected to retain the flat topography. Excavation activities needed for the construction of the structure, roadway improvements, and infrastructure lines would alter the surface soils on the site. However, the site would remain relatively flat.
- The project would lead to the removal of existing vegetation on-site, including the loss of existing trees, shrubs, and turf. However, new landscaping plants materials would be provided in more areas than existing, replacing animal habitats that may be temporarily lost during construction.
- The project would change drainage patterns and stormwater runoff would be detained on-site, with overflows conveyed into the drainage line proposed on Mountain Avenue. The provision of infiltration areas and an underground detention system would reduce runoff from the site.
- The project would change the visual quality of the site through the demolition of existing structures and construction of the proposed commercial structure. This change cannot be easily reversed as the existing buildings, vegetation and improvements are not likely to come back, even with demolition of the proposed Wal-Mart Supercenter project.
- Water and sewer line upgrades and replacement and the proposed storm drain line would improve the utility systems serving the City, including the provision of adequate fire flows and elimination of potential sewer overflows. These improvements would be irreversible unless the lines are replaced with smaller

Significant irreversible Changes AND Unavoidable Adverse Impacts (continued)

pipes. Roadway improvements would also improve traffic flows in the area and cannot be easily reversed unless the improvements are removed and existing roadway configurations are reconstructed.

Other impacts are expected to occur during the short-term construction phase of the project only or would occur during the operational phase but would not be irreversible. Rather, discontinuation of commercial activities at the site would reverse these environmental changes.

- The project would result in 450 employees that would be working at the Wal-Mart Supercenter, providing job opportunities for the local labor pool.
- Approximately 7,981 new vehicle trips on Mountain Avenue, Fifth Street, and other surrounding roadways would be generated by the project. The roadways are expected to handle the additional vehicle trips at acceptable levels of service, with the proposed roadway improvements and mitigation measures.
- Pollutant emissions from demolition and construction activities would occur but would be short-term, incremental, and would be minimized by standard conditions and mitigation measures. New vehicle trips on the surrounding roads would also cause an incremental increase in air pollutants associated with vehicle exhaust throughout the region. Stationary source pollutants would add to area and basin-wide air pollution levels. These emissions would exceed SCAQMD thresholds of significance, even after mitigation.
- Demolition and construction noise impacts would be temporary and short-term. Implementation of standard condition and mitigation measures would reduce these impacts. The project would contribute to ambient noise levels from vehicles traveling to and from the site. Stationary noise would also be generated by commercial activities at the site. While exterior noise levels can be reduced by perimeter walls and time restrictions, the impacts would continue for the life of the noise source.
- Changes in stormwater runoff quality would occur, as pollutants from the underutilized site would change to pollutants and debris associated with more parked vehicles and more intensive commercial uses. Stormwater pollutant control measures would reduce pollutants during construction and during operation of the project.
- The project site does not possess any significant energy, oil, or agricultural resources that would be adversely affected by the proposed project. Commitment of energy, water, and other natural resources for the construction and operation of the proposed commercial structure is expected. This resource utilization is not expected to represent significant amounts of available resources in the region.
- The increase in demand for public services would be served by current facilities and staffing of public service agencies. Payment of development impact fees would allow public facilities (fire, schools, libraries, and police) to provide adequate services. Annual review of service levels for fire and police services would ensure acceptable service levels are maintained.
- The project would generate a demand for public utilities and would require the extension of existing infrastructure lines. The demands for electrical power, natural gas, water, sewage treatment, and solid waste disposal that would be required to serve the project are within available supplies, resources, and facility capacities, with implementation of the standard conditions and mitigation measures.
- New light sources would be introduced to the environment. The stationary light sources could be eliminated with the elimination or discontinuation of the power source or removal of the light fixtures. Vehicle lights would continue to be generated as long as vehicles come to and from the site.

Significant Irreversible Changes AND Unavoidable Adverse Impacts (continued)

Except for the loss of on-site vegetation, demolition of existing structures, and the commitment of energy and mineral resources, all environmental changes can be reversed with the complete demolition of the proposed commercial building and infrastructure improvements on and near the site. Thus, discontinuance of commercial activities associated with the project would eliminate most of the changes outlined above.

5.2 UNAVOIDABLE ADVERSE IMPACTS

Section 15126(b) of the CEQA Guidelines states that the EIR shall identify the significant environmental effects which cannot be avoided if the proposed project is implemented.

Based on the analyses in Section 4.0 of this EIR, the proposed project would have the potential for adverse impacts on a number of environmental issues, including transportation and circulation, air quality, noise, geology and soils, hydrology and water quality, biological resources, police protection services, fire protection services, water services, sewer services, solid waste disposal, power, gas, telephone services, human health and hazards, visual quality and aesthetics, and cultural resources.

The EIR identifies standard condition compliance is expected to result in the avoidance of potentially significant adverse impacts that could be generated by the project. Other adverse environmental impacts would require the implementation of mitigation measures to reduce potentially significant adverse impacts to below a level of significance. The issue areas where mitigation measures have been identified include transportation and circulation, air quality, noise, geology and soils, biological resources, water and sewer services, human health and hazards, and cultural resources. Cumulative impacts on global climate change and greenhouse gases would also be reduced through identified mitigation measures.

Most of the environmental changes associated with the project can also be reduced to below levels of significance with the implementation of standard conditions and the recommended mitigation measures. However, traffic, noise, and air quality impacts from vehicle trips and emissions associated with the proposed project would remain significant and unavoidable, even after mitigation.

SCAQMD is implementing area-wide and regional air quality management programs and strategies in accordance with the Air Quality Management Plan for the South Coast air basin. These regulations, programs, and strategies have been designed to achieve federal and state clean air standards in the region by set deadlines. However, project-related pollutant emissions would exceed SCAQMD thresholds and would contribute to existing violations of federal and State air quality standards. Ambient noise levels along area roadways currently exceed standards for residential uses and abutting residences would be exposed to these levels in the future with or without the project. Traffic congestion at LOS E or worse currently occurs at three-intersections along Mountain Avenue and will continue to occur with or without the project, until the Ceityies of Ontario and Upland implements improvements needed to alleviate the congestion.