

## SECTION 6: SIGNIFICANT UNAVOIDABLE AVERSE IMPACTS

An EIR must disclose the significant unavoidable impacts that will result from implementation of a proposed project. Moreover, CEQA Guidelines section 15126(b) states that an EIR should explain the implications of such impacts and the reasons why the project is being proposed, notwithstanding such impacts. Implementation of the project would result in the alteration of the physical environment. The proposed project includes Project Design Features and proposes mitigation measures that either reduce or eliminate potentially significant impacts to a level below significance.

After implementation of the proposed project, it has been determined that the following environmental issues can be feasibly mitigated below the level of significance:

- Biological Resources
- Geology and Soils
- Hazards
- Hydrology and Water Quality
- Noise
- Public Services
- Utilities (except Solid Waste)
- Cultural Resources.
- Traffic
- Population and Housing
- Geology

The following environmental issues would remain significant and unavoidable after implementation of the proposed project:

- **Agriculture** - Implementation of this project would permanently convert agricultural operations and agricultural production on the project site to urban uses. Specifically, the Prime Farmland would be permanently converted and no longer available for agricultural uses or agricultural production.
- **Air Quality** - Implementation of the project would create impacts to air quality that would remain significant and unavoidable after implementation of mitigation measures as follows:
  - Significant regional short-term air quality impacts during construction from ROG, NO<sub>x</sub>, and PM<sub>10</sub> emissions.
  - Significant localized short-term air quality impacts during grading from PM<sub>10</sub> and PM<sub>2.5</sub>.

- Significant operational impacts during project occupancy from ROG, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions.
  - Cumulative health impacts during grading from localized emissions of PM<sub>10</sub> and PM<sub>2.5</sub>.
  - Cumulative health impacts during operation for ground-level ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>.
  - The project is not consistent with the 2003 AQMP.
  - The project is cumulatively considerable.
- **Biology - Cumulative Impacts** - Implementation of the Rich Haven Project in combination with the other related projects would result in the conversion of agricultural land uses to urban uses and elimination of the majority of windrows that, when used together, provide foraging habitat for migratory birds. In addition, the elimination of the onsite stormwater detention basin along with the elimination of the majority of other surface water features located throughout the NMC would eliminate habitat for migratory birds. Therefore, the elimination of windrows, foraging habitat, and surface water features would be cumulatively considerable.
  - **Hydrology and Water Quality** - Reach 1 of the Cucamonga Creek channel, Mill Creek (Prado Area) and Reach 3 of the Santa Ana River are currently in violation of the respective water quality standards. Therefore, development of the project area with the implementation of water quality BMPs has the potential to produce cumulative impacts on the quality of downstream surface waters and groundwater within the Chino Basin
  - **Land Use and Planning** - Implementation of the proposed project would decrease commercial development and increase residential development relative to the existing General Plan and create a jobs/housing ratio that is below that originally contemplated in the NMC General Plan and is inconsistent with SCAG regional policies.
  - **Noise - Cumulative Impacts** related to noise would be experienced in the region due to this project and other related projects resulting from traffic noise and other human activities. As the NMC transitions from agriculture to urban uses and population increases, noise associated with traffic, schools, recreation, shopping and other activities will increase throughout the City and region including areas of Riverside County. Cumulative impacts relating to noise are significant.
  - **Solid Waste** - According to the NMC General Plan EIR, cumulative impacts are significant due to the County's deficiency in aggregate disposal capacity.

The project is being proposed despite significant and unavoidable impacts because it represents one of thirty planning subareas within the NMC planned for cohesive, identifiable neighborhoods within the NMC for the purpose of implementing the vision of the NMC.