Supplemental Community Impact Assessment Memorandum

Date: November 27, 2017

Prepared For: San Bernardino County Transportation Agency
California Department of Transportation, District 8, Local Assistance

Prepared By: Jennifer Andersen, AICP, ICF

Project: Mount Vernon Avenue Bridge
08-SBd-0-Mount Vernon Avenue
Federal Project Number: BRLS-6507(003)
EA: 965120

1 Introduction

The San Bernardino County Transportation Agency (SBCTA), in cooperation with the California Department of Transportation (Caltrans), is proposing to replace the existing Mount Vernon Avenue Bridge (Bridge Number 54C-066) over the Burlington Northern Santa Fe (BNSF) rail yard in the city of San Bernardino, San Bernardino County, California.

A National Environmental Policy Act (NEPA) Finding of No Significant Impact (FONSI) was adopted for the Approved Project in June 2011. The approved project, which involves a road/railroad grade separation, is statutorily exempt from the California Environmental Quality Act (CEQA). Since the NEPA document was adopted it has been noted that additional project improvements/refinements are needed that were not included in the adopted NEPA document, requiring supplemental environmental review and documentation. This Supplemental Community Impact Assessment Memorandum focuses on impacts that would result from proposed changes to the approved project since adoption of the FONSI in 2011 and approval of the Community Impact Assessment in 2007. The "approved project" refers to the original project adopted in June 2011; "proposed project" refers to the new proposed changes to the project.

2 Project Purpose and Need

2.1 Project Purpose

The purpose of the proposed project is to provide a bridge that is structurally safe, meeting current seismic, design, and roadway standards.

2.2 Project Need

Seismically Deficient

The existing bridge was constructed in 1934 and incorporated steel girders salvaged from an earlier 1907 structure. As part of the Local Bridge Seismic Safety Retrofit Program, a seismic analysis and retrofit study were conducted in 1996. The Final Seismic Retrofit Strategy Report, issued in June 1997, determined that the bridge fell under Category 1, a category for bridges that could potentially collapse in a seismic event and threaten public safety.

Sufficiency Rating

Caltrans maintains the *National Bridge Inventory—Structure Inventory and Appraisal* for bridges both on and off the federal highway system in the state. The inventory includes a sufficiency rating for each bridge. The sufficiency rating is typically determined by three considerations: (1) structural adequacy and safety; (2) serviceability and functional obsolescence; and (3) essentiality for public use. A special reduction factor is considered to account for conditions related to detours, traffic safety features, and structure type. When a bridge has a deficient sufficiency rating, it is placed on the Federal Highway Administration Eligible Bridge List (EBL) to receive high priority for retrofit/rehabilitation or replacement under the Federal Highway Bridge Program (HBP).[1] A deficient bridge is defined as having a sufficiency rating ≤ 80 and a status flag as Structurally Deficient (SD). Bridges with a sufficiency rating ≤ 80 and SD or Functionally Obsolete (FO) status are eligible for rehabilitation, while bridges with a sufficiency rating ≤ 50 and SD or FO status are eligible candidates for replacement. In 2002, the sufficiency rating for the Mount Vernon Avenue Bridge was 45.6 with flags for both SD and FO. The major bridge deficiencies in 2002 were identified as poor deck condition, nonstandard deck geometry, and nonstandard underclearance at West 3rd Street. With the results of the 2004 bridge inspections, the sufficiency rating for the Mount Vernon Avenue Bridge has dropped to 2.0, which was reconfirmed in the latest bridge inspection report, dated December 27, 2016. The very low sufficiency rating for the bridge is the result of the following factors: low superstructure capacity, poor substructure condition, serious deck condition, inadequate deck geometry, and substandard vertical clearance at West 3rd Street. Additionally, the capacity of the existing bridge railing does not meet current standards.

Structurally Deficient (SD)

The bridge has a low superstructure capacity, poor substructure conditions, and deck deficiencies. The deck has moderate and severe transverse cracks and spalls at various locations. The steel bents have structural damage and heavy corrosion on almost all steel element connections. The girders receive a score of 0.0 for operating and inventory ratings due to several severe fatigue cracks on the girder-to-cap beam connections; however, the bridge remains open because of temporary supports that were installed in the early 2000s. Inventory and operating capacity is calculated at 20.8 and 35.4 metric tons, respectively.

[1] Formerly known as the federal Highway Bridge Replacement and Rehabilitation (HBRR) program

Functionally Obsolete (FO)

The existing bridge is considered to be FO because of the nonstandard deck geometry, misaligned south approach, and nonstandard vertical clearance at West 3rd Street.

Other Deficiencies

In addition to the previously described deficiencies, other serious conditions exist such as substandard vertical clearance over the railroad and substandard vertical clearance for 3rd Street. Additionally, the bridge was last painted in 1954. The paint condition index (PCI) dropped from 74.5 in 2000 to 38 in 2016. Bridges on the EBL with a PCI of 65.0 or less qualify as a stand-alone painting project under the federal HBP guidelines. Additionally, the existing bridge has nonstandard vertical and horizontal clearances at the BNSF railroad yard.

3 Project Description

The project is in the City of San Bernardino, San Bernardino County, California (Figures 1 and 2), along Mount Vernon Avenue Bridge 54C-066, Section 7, Township 1 South, and Range 4 West, on the San Bernardino South U.S. Geological Survey (USGS) 7.5-minute quadrangle map.

The Preferred Alternative (Alternative 3 – Bridge Replacement), identified in the adopted NEPA document, extended from just south of 5th Street to just north of King Street. Based on the identified project improvements/refinements, the proposed project would now extend from just south of 5th Street to Rialto Avenue (see Figure 3). The proposed improvements/refinements are listed below.

- A portion of the BNSF intermodal operations/parking area east of the bridge on the north side of the existing tracks would be removed, and a new paved area between Kingman Street and West 4th Street and from Cabrera Avenue to Mount Vernon Avenue would be constructed. (This would involve acquisition and removal of existing residences/businesses within these limits.) A 12-foot-tall block wall and a 20-foot-wide landscape buffer would be constructed along Kingman Street and Cabrera Avenue to shield this area from surrounding uses.
- Just west of Mount Vernon Avenue, West 4th Street would form an intersection with Cabrera Avenue.
- The existing Eagle Building and four associated buildings would be relocated from the east side of Mount Vernon Avenue to the west side of Mount Vernon Avenue.
- The two existing crane repair pads would be relocated north of their current location (one on either side of Mount Vernon Avenue).
- Temporary Tracks 218) identified in the adopted NEPA document, would now be a permanent rail track. A new permanent track (Track 219) would be a constructed.
- Tracks 216 and 217 would be realigned in the immediate vicinity of the new bridge.
- The structures at the southwest end of the bridge—bordered by Mount Vernon Avenue to the east, the alley behind the structures to the west, West 3rd Street to the north, and West 2nd Street to the south—would be acquired and removed.

- The access associated with structures fronting Mount Vernon Avenue south of West 2nd Street and north of King Street would be reconstructed as needed to match the new road/sidewalk grade.

Consistent with the updated project layout, the following would be incorporated:

- Utilities would be relocated as needed to accommodate the proposed improvements.
- Best management practices (BMPs) for water quality treatment would be provided as part of the proposed project where feasible.
- Signage would be incorporated within the project's limits of disturbance where necessary.
- Pedestrian facilities would be compliant with Americans with Disabilities Act standards.
- Geotechnical borings would be conducted within the project's limits of disturbance as needed for the design of the project.
- Temporary advanced signage would be required during construction, which would involve portable changeable message signs or other temporary signage that would not require ground disturbance.

4 Study Area

The study area is defined as the area close to the proposed project, and it includes the populations and communities most likely to experience potential adverse effects from the physical improvements associated with the proposed project. For this analysis, the study area includes Census Tract 49, Block Groups 2 and 4, as shown in Figure 4. These block groups are within the City of San Bernardino and San Bernardino County. The city and county will also be examined as part of this analysis in order to establish a context for comparison of distinct community characteristics that may be indicative of a community with strong cohesion.

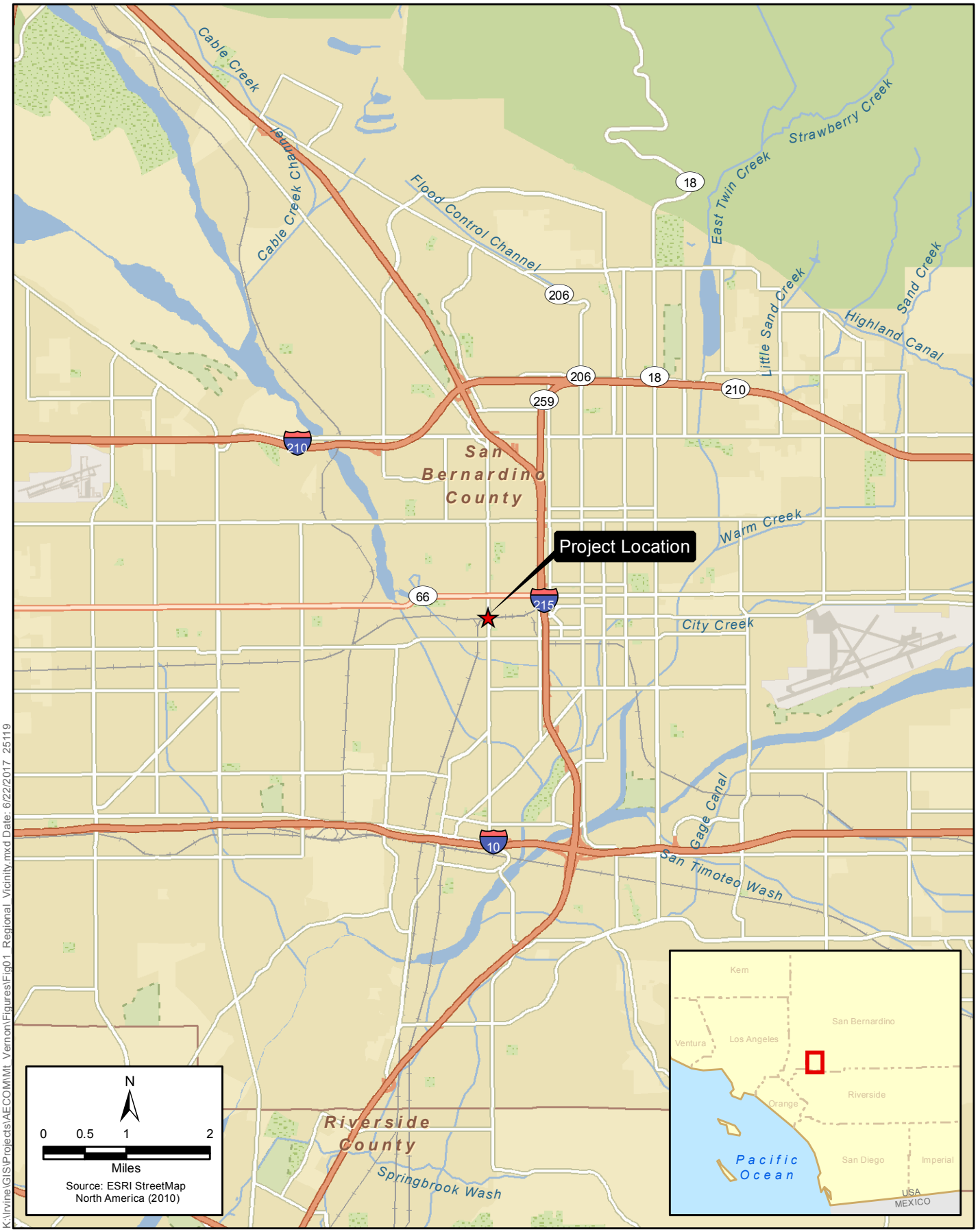

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Figure 1
Regional Vicinity Map
Mount Vernon Avenue Bridge Project

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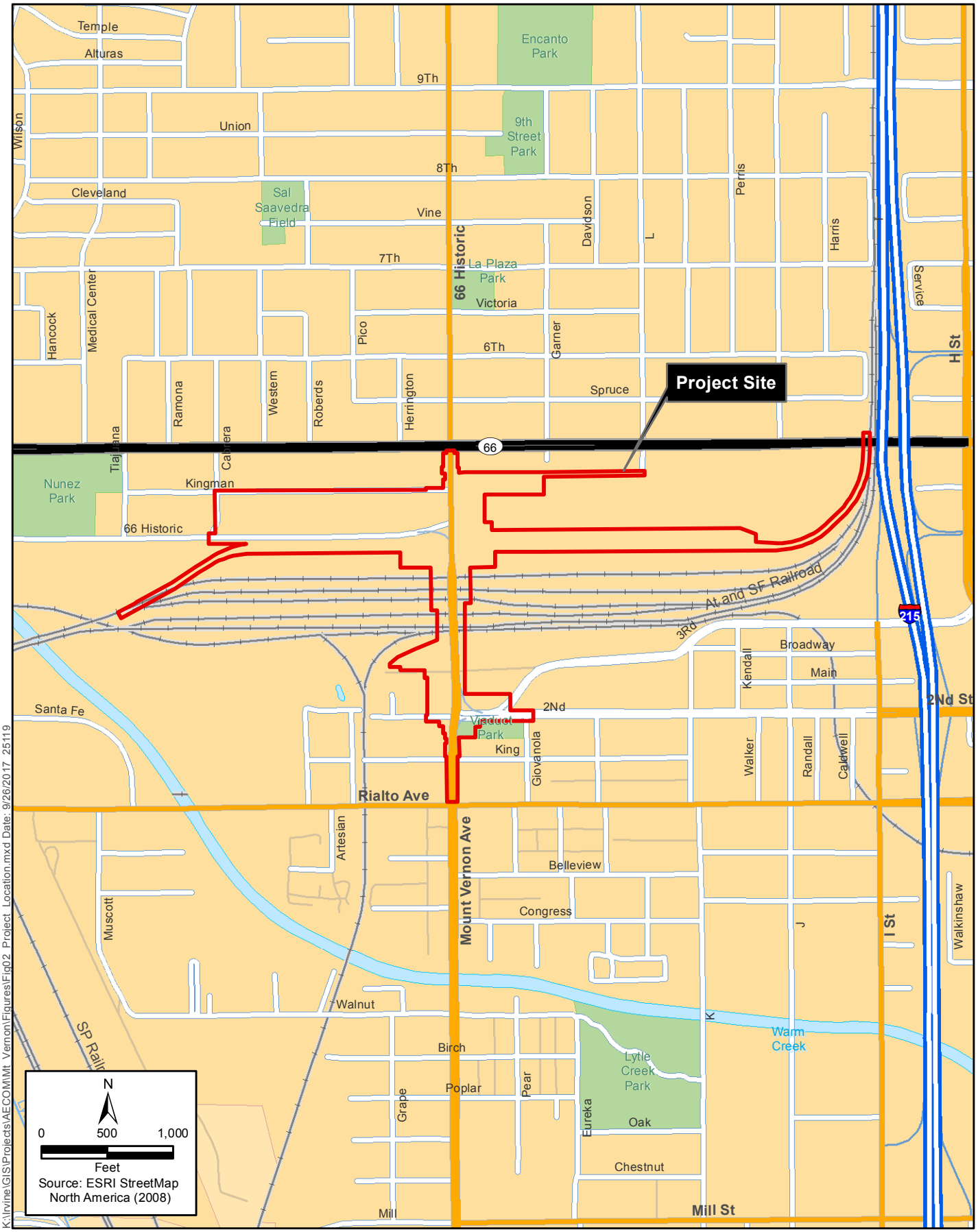

Figure 2
Project Location
Mount Vernon Avenue Bridge Project

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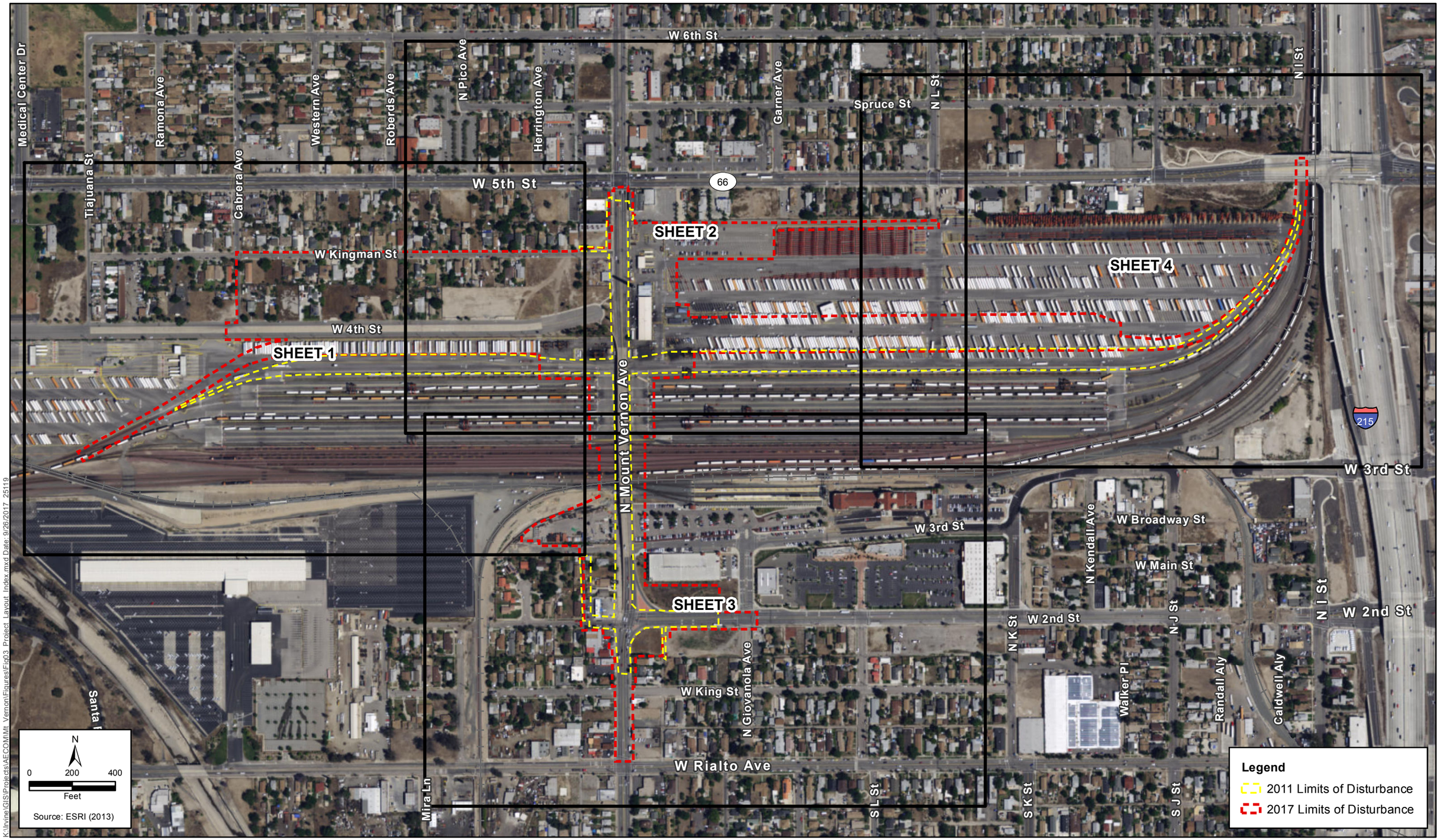

Figure 3
Project Layout Map Sheet Index
Mount Vernon Avenue Bridge Project

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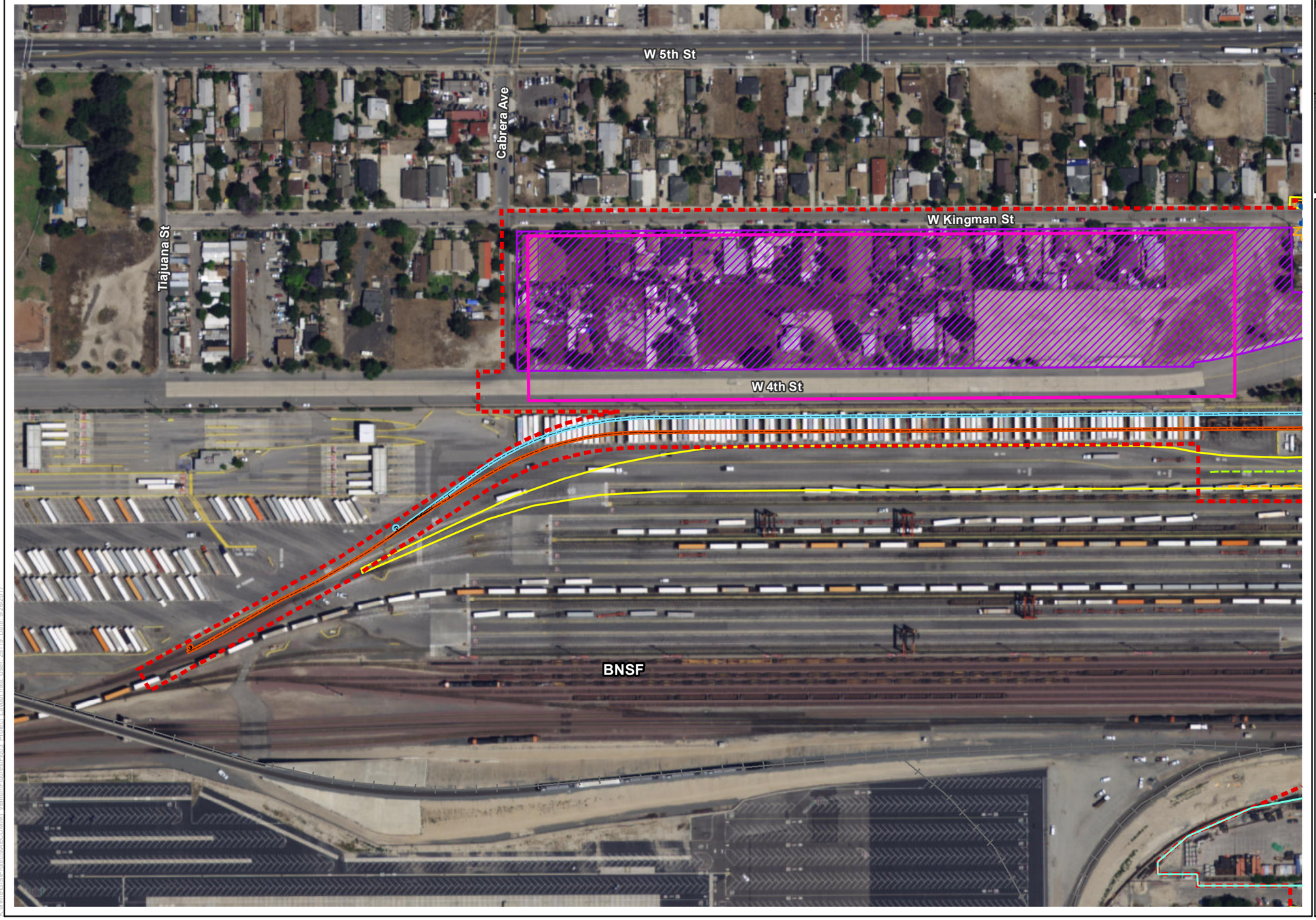

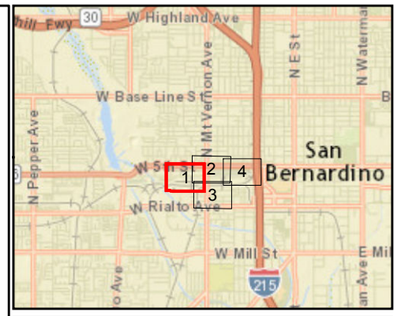

Legend

- Limits of Disturbance (2011)
- Limits of Disturbance (2017)
- Proposed Right-of-Way Acquisition
- Temporary Construction Easement
- Proposed Paved Edges
- Temporary Staging Area
- Realignment of Track 216
- Realignment of Track 217
- Future Track 218
- Future Track 219
- Proposed Drainage
- Proposed Striping
- Proposed Parking

Source: StreetMap North American (2013)

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Figure 3 - Sheet 1
Project Layout Map
Mount Vernon Avenue Bridge Project

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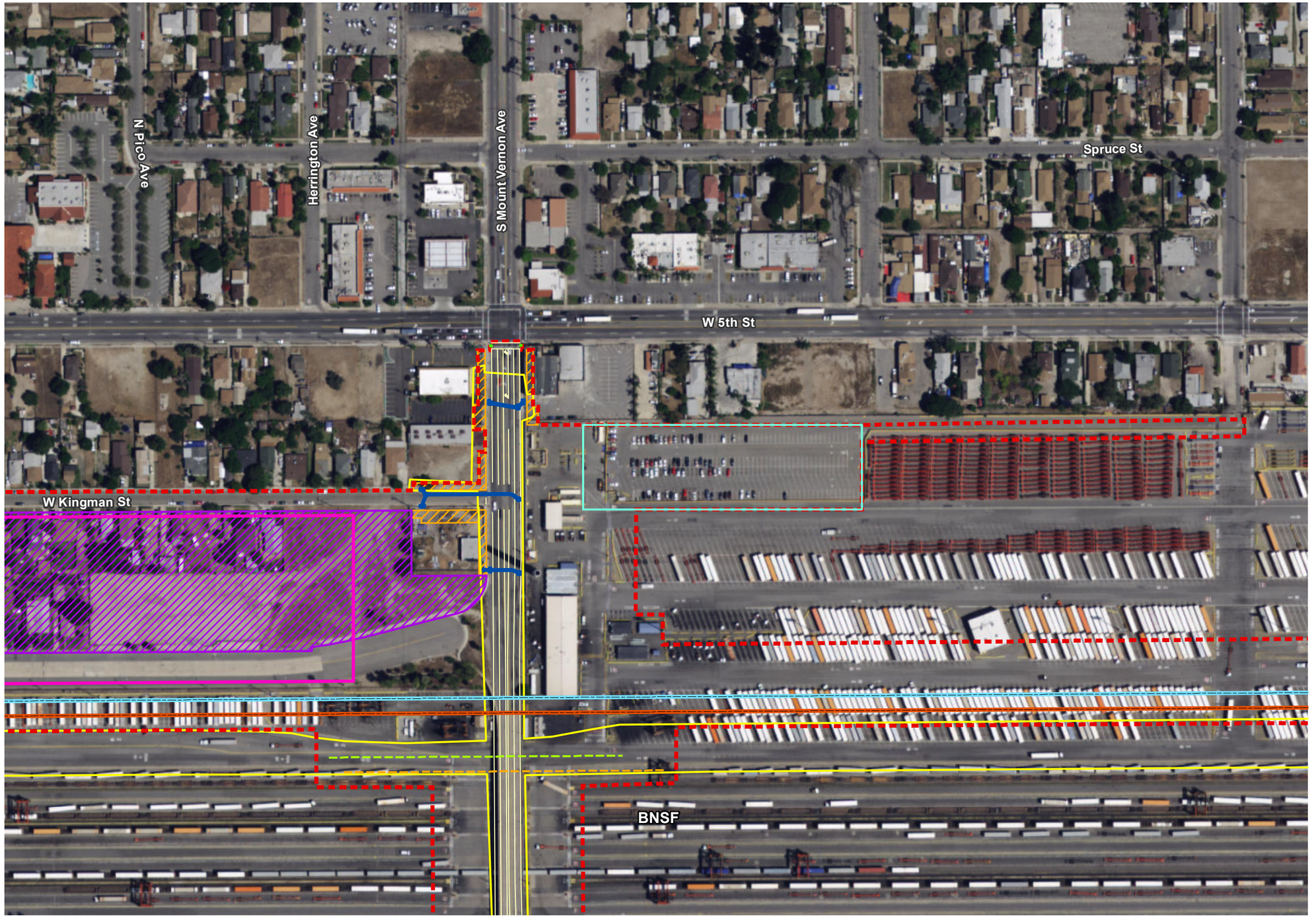

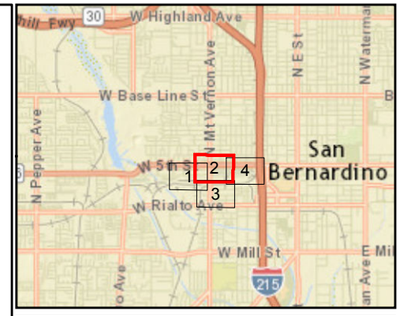

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- Future Track 219
- Proposed Drainage
- Proposed Striping
- Proposed Parking

Source: StreetMap North American (2013)

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Figure 3 - Sheet 2
Project Layout Map
Mount Vernon Avenue Bridge Project

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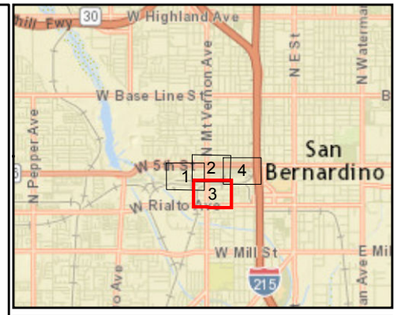

Legend

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- Proposed Striping
- Proposed Parking

Source: StreetMap North American (2013)

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Figure 3 - Sheet 3
Project Layout Map
Mount Vernon Avenue Bridge Project

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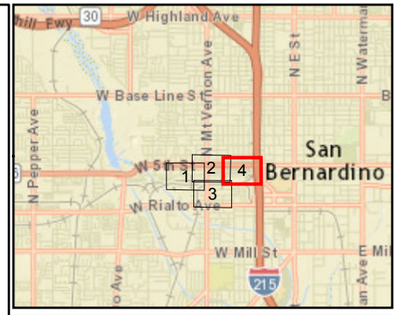

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Source: StreetMap North American (2013)

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Figure 3 - Sheet 4
Project Layout Map
Mount Vernon Avenue Bridge Project

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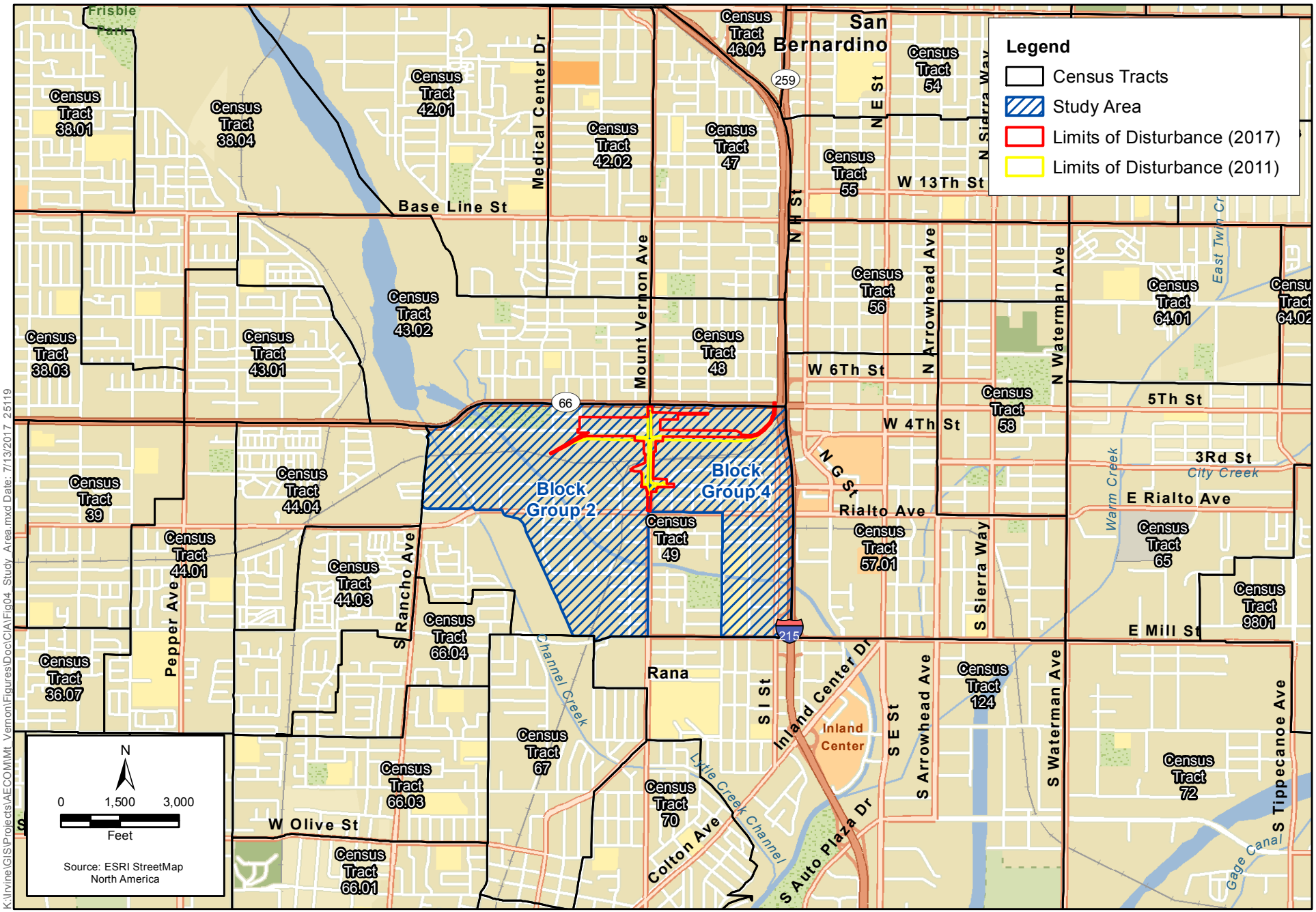

Figure 4
Study Area Map
Mount Vernon Avenue Bridge Project

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5 Affected Environment

This section describes existing conditions within the study area, including land use characteristics, community characteristics, community character and cohesion, and community facilities and services.

5.1 Land Use Characteristics

The study area is highly developed with commercial and residential uses, as well as transportation uses associated with the nearby BNSF railroad facility and Metrolink/Amtrak station. Residential neighborhoods are southwest of the study area, along the Mount Vernon Avenue service road between West 2nd and West 3rd Streets and also to the northwest, as shown in Figure 5.

The City of San Bernardino's General Plan identifies the area surrounding the project site as being in an area with several individual land use designations including: 1) Industrial, 2) Commercial, 3) Residential, 4) Utilities, 5) Parks, 6) Other Retail/Service, and 7) Institutions/Government (refer to Figure 5) (City of San Bernardino 2005). Existing development in the study area is generally consistent with the associated land use designations.

City of San Bernardino General Plan

Land use planning in the study area is governed by the City of San Bernardino General Plan, last updated in 2005 (City of San Bernardino 2005). The General Plan establishes the goals, objectives, policies, and programs applicable to the land use planning and development within the city. Table 5 in Section 6.1, Land Use, identifies the General Plan policies and goals that apply to the proposed project.

The City of San Bernardino's General Plan Circulation Element designates Mount Vernon Avenue as a Major Arterial. Major Arterials are defined as roadways that can accommodate six or eight travel lanes, may have raised medians, and can carry high traffic volumes. These roadways are the primary thoroughfares linking San Bernardino with adjacent cities and the regional highway system (City of San Bernardino 2005).

Paseo Las Placitas Specific Plan

There are eight approved specific plans governing land use development in designated areas throughout the city (City of San Bernardino 2005). The northern portion of the project site is within the Paseo Las Placitas Specific Plan (also known as Mount Vernon Corridor Specific Plan). The southern portion of the project site is not within a specific plan area. The intended use of this specific plan designation is to provide incentives and policies to help the businesses in the area become more economically viable and to improve the aesthetics of the streets in the Mount Vernon Corridor Specific Plan area (City of San Bernardino 2005).

Mount Vernon Strategic Area

The City of San Bernardino has designated certain areas as "Strategic Areas." The policies of the Strategic Areas are intended to help create, preserve, revitalize, and enhance selected areas of the city. Each Strategic Policy Area contains a brief description of the physical conditions and issues followed by a set of strategies (City of San Bernardino 2005). The entire project site is within the Mount Vernon Strategic Area. Policies established for the Mount Vernon Strategic Area do not specifically address the proposed project.

5.2 Community Characteristics

A study area has been defined to include the census block groups within which the proposed project is located. The study area is intended to encompass an area where the potential adverse community effects, if any, of construction and operation of the proposed project would be dominant. The study area encompasses two census block groups, as shown in Figure 4.

The American Community Survey (ACS) is used for this analysis to analyze the characteristics of communities on a small scale. Census block group data are used from the U.S. Census Bureau 2011–2015 five-year estimates.

Population and Housing

As mentioned previously, the proposed project is in the city of San Bernardino. Table 1 presents the racial and ethnicity data for the study area, the city, and county. As shown in the table, Hispanic or Latino persons (of any race) make up the largest ethnic group in the study area (89 percent), the city (62 percent), and the county (51 percent). The percentage of Hispanic or Latino persons in the study area is measurably higher than the percentages of Hispanic or Latino persons in both the city and county, indicating a predominately minority community. Non-Hispanic Whites are the next largest racial/ethnic group in the study area, accounting for five percent of the population, compared to 17 percent in the city and 31 percent in the county. The remaining population of the study area, in descending order, comprises Black or African American, Asian, and Native American. The Black or African American population accounts for three percent of the population in the study area, compared to 14 percent in the city and 8 percent in the county. The Asian population accounts for two percent of the population in the study area, compared to four percent in the city and seven percent in the county. The Native American population accounts for one percent of the population in the study area, compared to less than one percent in the city and county. There are no persons of the Other Race, Native Hawaiian/Pacific Islander, or Two or More Races groups in the study area, compared to two percent or less in the city and county (refer to Table 1).

Table 2 presents the housing characteristics in the county, city, and study area. The average household size of the study area, 4.68 persons per household, is larger than the average household size of both the city (3.55) and the county (3.33). The occupancy and vacancy rates of the study area are comparable to those of the city and county; however, the study area has a lower percentage of owner-occupied housing units (42 percent) compared with the city and county (47 and 60 percent, respectively). The data could indicate more short-term residents in the study area or lower-income groups, who are more likely to rent.

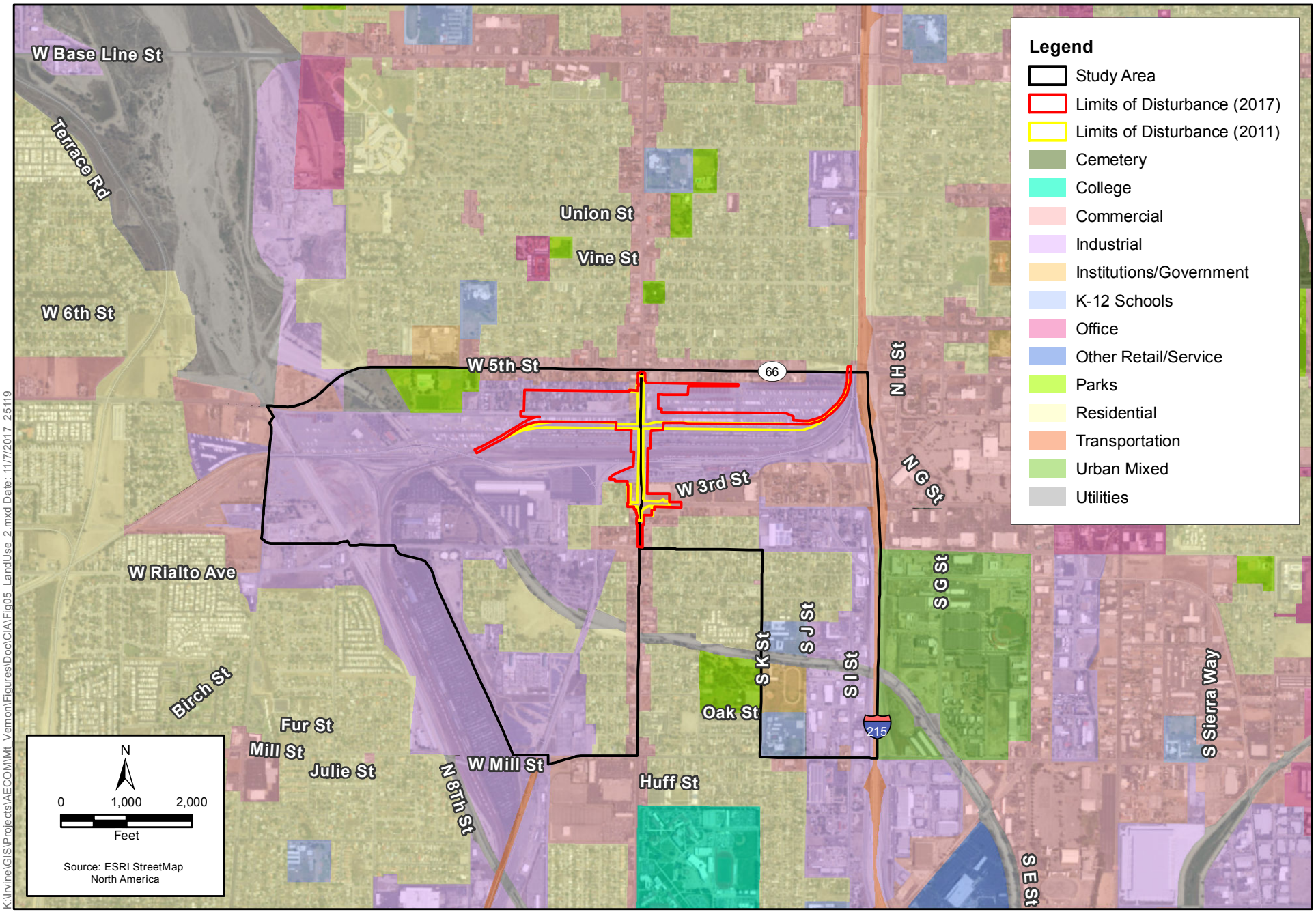

Figure 5
Existing Land Use Designations per City of San Bernardino General Plan
Mount Vernon Avenue Bridge Project

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Economic and Income Data

Table 3 presents the economic and income characteristics of the county, city, and study area. According to the U.S. Census Bureau, the labor force of the study area is 1,449 persons; the labor force of the city and county is 88,503 persons and 948,728 persons, respectively. The unemployment rate in the study area, 18 percent, is roughly the same as the unemployment rate in the city, 17 percent, but slightly higher than the unemployment rate in the county, 13 percent. This trend also corresponds to the income data for the study area, city, and county. The percentage of all people below the poverty level is 33 percent in the study area; it is also 33 percent in the city but 19 percent in the county. Additionally, the study area has a lower median household income ($30,440) than both the city ($37,047) and the county ($53,433). However, each median household income is greater than the 2017 federal annual income poverty guideline of $24,600 for a household of four, as identified by the U.S. Department of Health and Human Services (U.S. Department of Health and Human Services 2017).

5.3 Community Character and Cohesion

As noted earlier, the predominant land uses within the project area include the railroad-related facilities for the BNSF, Amtrak, and Metrolink, with neighborhoods of single- and multi-family residences and commercial strips established north and south of the proposed project site along Mount Vernon Avenue and the intersecting cross streets. There are two neighborhoods within the study area, Amtrak and Lytle Creek (City of San Bernardino 2017). The Amtrak Neighborhood falls within the area of 5th Street to Mill Street and Rancho Avenue to Mount Vernon Avenue. The Lytle Creek Neighborhood falls within the area of 5th Street to Mill Street and Mount Vernon Avenue to Interstate 215.

Certain characteristics of the residential neighborhoods and commercial centers near the project site, including their apparent longevity, physical and spatial attributes, community facilities, and demographic profile, are indicative of an established, cohesive community. Most homes in this area are more than 30 years old, which suggests that some aspects of cohesiveness and neighborhood character have developed over time among long-term residents. In addition, the residential areas are relatively dense and surrounded by commercial properties or roadways, thereby contributing to a sense of community through spatial proximity. There are also 13 community facilities (e.g., schools, parks, churches, libraries, transportation centers) within 0.5 mile of the project site, as shown below in Table 4. This indicates a variety of community facilities that residents can walk to, which could indicate a stronger sense of community. Finally, the demographic data for the study area in which the proposed project is located in contains a population that is 89 percent Hispanic or Latino, which could indicate a high degree of cohesiveness in the community. To the extent that demographic and physical characteristics have enabled a shared sense of stability to develop, some degree of community cohesion very likely exists in this neighborhood. However, there are indications of a lack of community cohesion, such as poorly maintained properties and many vacant parcels.

5.4 Community Facilities and Services

Community facilities and services that serve the project area are listed below in Table 4. Those indicated with an asterisk (*) are within the study area.

Table 1. Race and Ethnicity Data

	Total Pop-ulation	Hispanic or Latino (of any race)		Non-Hispanic													
				White		Black or African American		Native American		Asian		Native Hawaiian/ Pacific Islander		Other Race		Two or More Races	
		#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
San Bernardino County	2,094,769	1,070,262	51%	652,920	31%	169,547	8%	7,616	>1%	136,830	7%	6,611	>1%	3,855	>1%	47,128	2%
City of San Bernardino	214,112	132,504	62%	36,694	17%	29,181	14%	558	>1%	9,372	4%	441	>1%	483	>1%	4,879	2%
Study Area	3,718	3,342	89%	164	5%	93	3%	35	1%	84	2%	0	0%	0	0%	0	0%
Census Tract 49 Block Group 2	2,265	2,106	93%	52	2%	0	0%	23	1%	84	4%	0	0%	0	0%	0	0%
Census Tract 49 Block Group 4	1,453	1,236	85%	112	8%	93	6%	12	1%	0	0%	0	0%	0	0%	0	0%

Source: U.S. Census Bureau 2017a.

Table 2. Housing Characteristics

	Total Households	Average Household Size	Housing Units					Occupied Housing Units			
			Total	Occupied		Vacant		Owner Occupied		Renter Occupied	
				#	%	#	%	#	%	#	%
San Bernardino County	614,325	3.33	705,962	614,325	87%	91,637	13%	366,514	60%	247,811	40%
City of San Bernardino	57,580	3.55	62,683	57,580	92%	5,103	8%	27,033	47%	30,547	53%
Study Area	771	4.68	885	771	87%	114	13%	334	42%	437	59%
Census Tract 49 Block Group 2	423	5.28	469	423	90%	46	10%	258	61%	165	39%
Census Tract 49 Block Group 4	348	4.07	416	348	84%	68	16%	76	22%	272	78%

Source: U.S. Census Bureau 2017b, 2017f, 2017g, 2017h.

Table 3. Economic and Income Characteristics

	Total in Civilian Labor Force	Total Unemployed	Unemployment Rate	Median Household Income ($)	Population for Whom Poverty Status Is Determined: Total	% All People Below Poverty Level
San Bernardino County	948,728	119,583	13%	$53,433	2,041,779	19%
City of San Bernardino	88,503	14,708	17%	$37,047	206,586	33%
Study Area	1,449	251	18%	$30,440	3,718	33%
Census Tract 49 Block Group 2	786	130	17%	$28,821	2,265	31%
Census Tract 49 Block Group 4	663	121	18%	$32,059	1,453	34%

Source: U.S. Census Bureau 2017c, 2017d, 2017e.

Table 4. Community Facilities and Services near the Project Site

Type	Name	Address	Distance from Project (miles)
Fire/EMS	San Bernardino Fire Department, Station #222	1201 West 9th Street	0.48
Police/Sheriff	San Bernardino Police Department	1584 West Base Line Street, #106	1.06
	San Bernardino Police Department	710 North D Street	1.22
Schools	Lytle Creek Elementary School*	275 South K Street	0.45
	Ramona Alessandro Elementary School	670 North Ramona Avenue	0.20
	Mt. Vernon Elementary School	1271 West 10th Street	0.60
	Richardson PREP HI Middle School*	455 South K Street	0.62
Parks	Gateway Park*	1717 West 5th Street	0.25
	La Plaza City Park	685 North Mount Vernon Avenue	0.20
	Encanto Park	West 10th Street/North Garner Avenue	0.60
	Lytle Creek Park	South K Street/West Oak Street	0.45
	Sal Saavedra Field	780 Roberds Avenue North	0.41
Community Centers	Senior Citizens Center	600 West 5th Street	0.75
	San Bernardino Area Chamber of Commerce	546 West 6th Street.	0.85
Places of Worship	Our Lady of Guadalupe Church*	1430 West 5th Street	0.10
	Iglesia del Nazareno	1495 West Union Street	0.50
	Temple Missionary Baptist Church	1583 West Union Street	0.62
	Casa de Oracion Camino de Vida	1065 West 8th Street	0.53
	St Philip the Apostle Melkite Greek Catholic Church*	923 West Congress Street	0.60
	Downtown Apostolic Church	766 West 6th Street	0.53
	Holy Tabernacle Church*	1322 West Belleview Street	0.15
Library	Villasenor Branch Library*	525 North Mount Vernon Avenue	0.04
Transportation Centers	Metrolink San Bernardino Station Park & Ride*	1204 West 3rd Street	>0.01
	San Bernardino Greyhound Bus Station	596 North G Street	0.55
	Omnitrans Bus Terminal*	1700 West 5th Street	0.30

Notes:
* Within study area

6 Environmental Consequences

Environmental consequences are analyzed below for adverse effects potentially resulting from implementation of the proposed project. Potential adverse effects from features of the approved project that remain the same under the proposed project are not discussed.

6.1 Land Use

Construction-Period Effects

Build Alternative

Temporary construction easements (TCEs) would be required during the construction period to facilitate access to construction work areas. These TCEs would occur on parcels adjacent to the project site, as discussed below under Acquisitions and Relocations. These would not affect existing land uses adjacent to the project site. Because the need for these TCEs would be temporary, and the parcels would be returned to the landowner after construction is complete, no adverse effect on existing land uses would result.

No-Build Alternative

The No-Build Alternative would not affect existing land uses because the proposed project would not be built, thereby avoiding the conversion or use of existing land uses.

Operational Effects

Build Alternative

The proposed project includes relocating a portion of the BNSF intermodal operations area, currently located east of the bridge on the north side of the existing rail tracks, to a new facility between Kingman Street and West 4th Street and between Cabrera Avenue and Mount Vernon Avenue. This would involve the additional permanent acquisition and relocation of 28 single-family residences, one multi-family residence (duplex), and one nonresidential unit (car wash) beyond the acquisitions previously approved under the approved project, which is a small percentage (3.7 percent) of the total number of households in the study area (771 households), as further discussed below under Acquisitions and Relocations. This would result in a change in land use from the existing use of these properties to transportation right of way. However, given the relatively small number of relocations compared with the number of households in the study area, this change in land use would not result in an adverse effect under the proposed project.

Consistency with State, Regional, and Local Plans

Table 5 presents the consistency analysis for the proposed project and the No-Build Alternative. Although replacement of the Mount Vernon Avenue Bridge is not specifically identified in any of the applicable land use plans or policies, renovation of the bridge is consistent with local plans and policies. Policies within the City of San Bernardino General Plan cite the safe and efficient movement of traffic as an important community objective. Because the proposed project is intended to address

that goal by providing a safe and reliable bridge structure for a normal useful lifespan, it would be considered consistent with the adopted local plans and policies. Thus, no adverse effects related to consistency with local plans would result from the proposed project. The proposed project would not negatively affect implementation of the Paseo Las Placitas Redevelopment Plan or the Mount Vernon Corridor Strategic Area Plan. Policies established for the Mount Vernon Strategic Area do not specifically address the proposed project and are not discussed further.

The proposed project is consistent with the City of San Bernardino General Plan Circulation Element, which classifies Mount Vernon Avenue as a Major Arterial. Major Arterials can accommodate six or eight travel lanes, may have raised medians, and can carry high traffic volumes. Although the proposed structure, with its two-lane configuration (four travel lanes), is at variance with respect to the six to eight (maximum) lanes typical of the Major Arterial roadway classification, neither this classification nor the San Bernardino General Plan contain a specific requirement for Mount Vernon Avenue to be six to eight lanes if projected traffic does not warrant the use of six to eight lanes. Therefore, the proposed project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an adverse environmental effect.

Under the No-Build Alternative, no new or modified bridge improvements would be constructed at the project site. The existing shoring that currently supports the bridge was upgraded in 2014 for a 10-year life; the BNSF license was extended for 10 years. Barring other safety issues, the bridge would remain open until at least 2024 under the No-Build Alternative. After 2024, it is unknown if the bridge would remain open or not. Insofar as no improvements would be made to the bridge crossing, and the potential for the bridge to close after 2024 is unknown, this alternative would be inconsistent with local and regional plans and policies.

Table 5. Consistency with State, Regional, and Local Plans and Programs

Policy	Revised Project	No-Build Alternative
City of San Bernardino General Plan		
Policy 2.2.5: Establish and maintain an ongoing liaison with Caltrans, the railroads, and other agencies to help minimize impacts and improve aesthetics of their facilities and operations, including possible noise walls, berms, limitation on hours and types of operations, landscaped setbacks, and decorative walls along its periphery.	**Consistent**. Ongoing communication and coordination between SBCTA, Caltrans, and BNSF has occurred under the proposed project to further improve the Mount Vernon Avenue Bridge Project, which has led to the inclusion of a 12-foot block wall around the new BNSF intermodal operations area to shield it from surrounding uses.	**Not Consistent**. Under the No-Build Alternative, coordination between SBCTA, Caltrans, and BNSF may occur but would not lead to any proposed improvements to enhance the aesthetics of BNSF's facilities and operations.
Policy 2.3.6: Circulation system improvements shall continue to be pursued that facilitate connectivity across freeway and rail corridors.	**Consistent**. The proposed project is a grade-separation project that would enhance connectivity across a rail corridor.	**Not Consistent.** Under the No-Build Alternative, no improvements would be made, and the bridge could close after 2024, which would not enhance connectivity across a rail corridor.

Policy	Revised Project	No-Build Alternative
Policy 2.3.7: Improvements shall be made to transportation corridors that promote physical connectivity and reflect consistently high aesthetic values.	**Consistent**. The proposed project is a grade-separation project that would promote physical connectivity by continuing the grade-separated crossing at Mount Vernon Avenue. The proposed project would also improve the aesthetics at the project site through construction of a 12-foot-high block wall and 20-foot-wide landscape buffer to provide aesthetic relief to adjacent viewers by blocking views of the rail yard.	**Not Consistent.** Under the No-Build Alternative, no improvements would be made, and the bridge could close after 2024, which would not promote physical connectivity. In addition, no improvements to the aesthetic environment would be made.
Policy 2.8.1: Ensure that all structures comply with seismic safety provisions and building codes.	**Consistent**. The proposed project would comply with seismic safety provisions and building codes.	**Not Consistent**. The No-Build Alternative would not comply with seismic safety provisions and building codes because no improvements would occur.
Goal 6.7: Work with the railroads and other public agencies to develop and maintain railway facilities that minimize the impacts on adjacent land uses.	**Consistent**. The proposed project involves coordination between SBCTA, Caltrans, and BNSF to maintain BNSF's facilities and operations while minimizing adverse environmental effects.	**Not Consistent**. Under the No-Build Alternative, coordination between SBCTA, Caltrans, and BNSF may occur but would not lead to any proposed improvements to address BNSF's facilities or operations.
Policy 6.7.3: Encourage the provision of a buffer between residential land uses and railway facilities, and encourage the construction of sound walls or other mitigating noise barriers between railway facilities and adjacent land uses.	**Consistent**. The proposed project includes the construction of a 12-foot block wall around the new BNSF intermodal operations area to shield it from surrounding uses.	**Not Consistent**. Under the No-Build Alternative, no buffers between BNSF facilities and surrounding land uses would be constructed.

Source: City of San Bernardino 2005.

No-Build Alternative

The No-Build Alternative would not affect existing land uses because the proposed project would not be constructed, thereby avoiding the conversion of existing land uses.

6.2 Community Character and Cohesion

Construction-Period Effects

Build Alternative

Construction effects on community character and cohesion under the proposed project would be the same as under the 2011 approved project, except that the limits of construction have been expanded under the proposed project to include additional improvements and the duration of construction would be longer (26 months under the proposed project compared to 7 months under the approved project). Construction activities would now extend from just south of 5th Street to Rialto Avenue as well as between Kingman Street and West 4th Street and between Cabrera Avenue and Mount Vernon Avenue. This would expand the areas of the community that would be exposed to construction activities. Such activities would result in temporary, localized, site-specific disruptions to the community in these areas for a longer period of time. The disruptions would stem primarily from construction-related traffic changes associated with trucks and equipment in the area; partial and/or complete street and lane closures, some of which would require detours; increased noise and vibration; lights and glare; and changes in air emissions. As identified under the approved project, traffic, including Omnitrans bus routes, would most likely be detoured around the project site via Rialto Avenue, G and H Streets, and 5th Street. In addition, traffic, including Omnitrans bus routes, using 2nd Street to access Mount Vernon Avenue would very likely be detoured to Rialto Avenue. Signage would be placed along the detour routes to guide motorists. These detours would result in a change in the bus routes that typically travel through or along Mount Vernon Avenue, which includes Routes 1 and 15. However, advance warning of any changes in bus routes would be posted in buses and at stations so that travelers are aware in advance of any changes.

During construction, there would be no pedestrian access across the BNSF rail yard at the bridge location during the two-year construction period. In addition, the bridge may be demolished up to two years prior to project construction because of the poor condition of the structure. The shortest alternative pedestrian route is approximately two miles in length. This would affect pedestrians, including students who walk to school and may have to cross Mount Vernon Avenue. Therefore, it would be necessary to provide alternative motorized means of transportation for pedestrians while the bridge is inaccessible. Based on the data and analyses presented above, TR-2 in the Final Environmental Assessment (EA) prepared for the approved project stated that a bus pass for area residents would be provided to compensate for pedestrian access that would be eliminated by closure of the bridge during construction (Caltrans 2010). Free bus passes, provided by the City of San Bernardino, for travel on existing Omnitrans routes would ensure mobility for area residents and students who would be affected by the bridge closure. Under the proposed project, this measure would be required for a longer period of time than under the approved project, which stated that the measure would be required from mid-2012 to mid-2014. The alternative is the most practical and cost-effective means for providing such mobility.

Because construction activities would be temporary and would not be likely to have effects that would be substantially different from the same types of nuisance-like effects associated with typical construction activities throughout Southern California, no short-term adverse effects are expected to result. This conclusion is consistent with the conclusion in the Final EA.

No-Build Alternative

There would be no changes to neighborhoods or community character under the No-Build Alternative because construction activities would not occur.

Operational Effects

Build Alternative

The proposed project would provide overall operational benefits in terms of vehicular safety and faster crossing times from construction of the improved bridge. This would provide improved access to community facilities in the area. However, 28 single-family residences, one multi-family residence (duplex), and one nonresidential unit would be relocated from implementation of the proposed project, which could have an adverse effect on community cohesion. Despite this relocation of residences and one nonresidential unit, this would not cause a physical division in the community because the properties are on the fringe of the surrounding neighborhood, leaving the community largely intact. Also, given the relatively small percentage of relocations (3.7 percent) with respect to the total number of households in the study area (771 households), this change in community character would be minor.

As discussed below under Acquisitions and Relocations, there is adequate replacement housing in the area (i.e., a five-mile radius from the project site) for the displaced with inclusion of the Housing of Last Resort Program. The relocation of residents would not have an adverse effect on the community. Relocation assistance payments and counseling would be provided to persons in accordance with the Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended, to ensure adequate relocation assistance and decent, safe, and sanitary housing for displaced residents. Furthermore, all eligible displacees would be entitled to moving expenses.

Because of the specific nature of the nonresidential unit (car wash), it is anticipated that comparable commercial properties will require modifications to meet the specific needs of the car wash, unless an available car wash site is found upon implementation of relocation assistance. If modifications are required to convert a property into a car wash, additional entitlements, such as conditional use permits from the City, would likely be required prior to any modifications being made.

Based on the above discussion, the proposed project would not have an adverse effect on community character and cohesion from operations.

No-Build Alternative

There would be a negative change with respect to neighborhoods or community character under the No-Build Alternative because no improvements would be made, and the bridge could close after 2024, which would restrict access within the community by removing the primary connection between areas north and south of the rail yard. No acquisitions or residential or business relocations would occur under the No-Build Alternative.

6.3 Growth

Construction-Period Effects

Build Alternative

As disclosed for the approved project, under the proposed project, growth effects would be unlikely during construction because project construction would not cause an increase in population.

No-Build Alternative

Under the No-Build Alternative, neither bridge modification nor replacement would occur; therefore, it is unlikely that the No-Build Alternative would result in either temporary or construction-related unplanned growth.

Operational Effects

Build Alternative

The first-cut screening analysis conducted for the approved project is applicable to the proposed project because no factors that could influence growth have changed since the approved project was adopted. These factors include:

- Accessibility – To what extent would change in accessibility affect growth or land use (its location, rate, type, or amount)?
- To what extent would travel times, travel cost, or accessibility to employment, shopping, or other destinations be changed?
- Would this change affect travel behavior, trip patterns, or the attractiveness of some areas to development over others?
- Resources of Concern/Land Use – To what extent would resources of concern be affected by this growth or land use change?

Given the first-cut screening analysis for the approved project, it is determined that growth resulting from the proposed project is not foreseeable. Therefore, a growth-related analysis is not warranted for the project.

No-Build Alternative

Although the mobility of populations in the vicinity of the project area would be affected, unplanned growth due to the potential elimination of the crossing after 2024 would not be likely.

6.4 Acquisitions and Relocations

Construction-Period Effects

Build Alternative

A summary of TCEs is provided below in Table 6. A total of 18 parcels would require TCEs under the proposed project. Because these would be temporary, and the parcels would be restored and returned to the owner following construction, no permanent adverse effect would result.

Table 6. Temporary Construction Easements under the Proposed Project

Parcel Number	Address	Existing Land Use
0138-191-01	1293 West 5th Street, San Bernardino, CA 92411	Commercial/Night Club
0138-181-25	No Property Address Found	Vacant
0138-181-24	Protected per CA Govt. Code Sect. 6254.21	Vacant
0138-181-23	472 North Mount Vernon Avenue, San Bernardino, CA 92410	Motel
0138-181-22	Protected per CA Govt. Code Sect. 6254.21	Vacant
0138-181-46	1305 West 5th Street, San Bernardino, CA 92411	Retail
0138-182-19	436 North Mount Vernon Avenue, San Bernardino, CA 92410	Vacant
0138-182-20	Protected per CA Govt. Code Sect. 6254.21	Commercial
0138-182-21	436 North Mount Vernon Avenue, San Bernardino, CA 92410	Vacant
0138-283-40	196 North Mount Vernon Avenue, San Bernardino, CA 92410	Auto Repair
0138-283-16	190 North Mount Vernon Avenue, San Bernardino, CA 92410	Single-family Residence
0138-283-17	170 North Mount Vernon Avenue, San Bernardino, CA 92410	Retail
0138-283-18	No Property Address Found	Parking Lot
0138-283-19	160 North Mount Vernon Avenue, San Bernardino, CA 92410	Single-family Residences
0138-291-16	151 North Mount Vernon Avenue, San Bernardino, CA 92410	Single-family Residences
0138-291-17	153 North Mount Vernon Avenue, San Bernardino, CA 92410	Single-family Residential
0138-291-18	155 North Mount Vernon Avenue, San Bernardino, CA 92410	Single-family Residential
0138-211-01	1535 West 4th Street, San Bernardino, CA 92411	BNSF

Source: AECOM 2017.

No-Build Alternative

There would be no TCEs under the No-Build Alternative because the proposed project would not be implemented.

Operational Effects

Build Alternative

A summary of permanent acquisitions by assessor parcel number is provided in Table 7. Three parcels would require permanent partial acquisition; all are owned by private individuals. The proposed project would also require permanent full acquisition of 63 parcels to implement the project. Many of the parcels are either vacant or already owned by BNSF and therefore would not require relocation. However, 28 single-family residences, one multi-family residence (duplex), and one nonresidential unit (car wash) would be fully acquired under the proposed project and would require relocation. The residential acquisitions would affect a total of 29 residential units and approximately 107 residents[2]. Additional information on the proposed acquisitions and relocations is included in the Draft Relocation Impact Statement that was prepared for the proposed project (Caltrans 2017).

Table 7. Permanent Acquisitions under the Revised Project

Assessor Parcel Number	Address	Existing Land Use	Proposed Land Use	Partial or Full Acquisition	Require Relocation Yes/No
0138-174-11	1457 West Kingman Street, San Bernardino CA 92411	Single-family Residence	Intermodal Yard	Full	Yes
0138-174-12	1455 West Kingman Street, San Bernardino, CA 92411	Vacant lot	Intermodal Yard	Full	No
0138-174-13	1472 West 4th Street, San Bernardino, CA 92411	Residential	Intermodal Yard	Full	Yes
0138-174-26	1479 West Kingman Street, San Bernardino, CA 92411	Residential	Intermodal Yard	Full	Yes
0138-182-01	No Property Address Found	Vacant	Intermodal Yard	Full	No
0138-182-02	1447 West Kingman Street, San Bernardino, CA 92411	Residential	Intermodal Yard	Full	Yes
0138-182-03	1439 West Kingman Street, San Bernardino, CA 92411	Residential	Intermodal Yard	Full	Yes

[2] Estimate is from the Relocation Impact Report - estimate of residents is based upon an average of 3.55 persons per household (2011-2015 US Census Statistics).

Assessor Parcel Number	Address	Existing Land Use	Proposed Land Use	Partial or Full Acquisition	Require Relocation Yes/No
0138-182-04	1431 West Kingman Street, San Bernardino, CA 92411	Residential	Intermodal Yard	Full	Yes
0138-182-34	1432 West 4th Street, San Bernardino, CA 92411	Residential	Intermodal Yard	Full	Yes
0138-182-05	No Property Address Found	Vacant	Intermodal Yard	Full	No
0138-182-07	1407 West Kingman Street, San Bernardino, CA 92410	Residential	Intermodal Yard	Full	Yes
0138-182-08	1399 West Kingman Street, San Bernardino, CA 92411	Residential	Intermodal Yard	Full	Yes
0138-182-09	1397 West Kingman Street, San Bernardino, CA 92411	Residential	Intermodal Yard	Full	Yes
0138-182-10	No Property Address Found	Vacant	Intermodal Yard	Full	No
0138-182-11	1371 West Kingman Street, San Bernardino, CA 92410	Residential	Intermodal Yard	Full	Yes
0138-182-12	1367 West Kingman Street, San Bernardino, CA 92411	Residential	Intermodal Yard	Full	Yes
0138-182-13	1357 West Kingman Street, San Bernardino, CA 92411	Residential	Intermodal Yard	Full	Yes
0138-182-35	1438 West 4th Street, San Bernardino, CA 92411	Residential	Intermodal Yard	Full	Yes
0138-182-36	1442 West 4th Street, San Bernardino, CA 92411	Residential	Intermodal Yard	Full	Yes
0138-182-37	1448 West 4th Street, San Bernardino, CA 92411	Residential	Intermodal Yard	Full	Yes
0138-182-38	1415 West Kingman Street, San Bernardino, CA 92411	Residential	Intermodal Yard	Full	Yes
0138-174-01	443 Cabrera Avenue, San Bernardino, CA 92411	Residential	Intermodal Yard	Full	Yes
0138-174-02	No Property Address Found	Vacant	Intermodal Yard	Full	No
0138-174-05	1507 West Kingman Street, San Bernardino, CA 92411	Residential	Intermodal Yard	Full	Yes

Assessor Parcel Number	Address	Existing Land Use	Proposed Land Use	Partial or Full Acquisition	Require Relocation Yes/No
0138-174-06	1501 West Kingman Street, San Bernardino, CA 92411	Residential	Intermodal Yard	Full	Yes
0138-174-07	1495 West Kingman Street, San Bernardino, CA 92411	Residential	Intermodal Yard	Full	Yes
0138-174-08	1487 West Kingman Street, San Bernardino, CA 92410	Residential	Intermodal Yard	Full	Yes
0138-174-18	1522 West 4th Street, San Bernardino, CA 92411	Residential	Intermodal Yard	Full	Yes
0138-174-20 0138-174-19	1528 West 4th Street, San Bernardino, CA 92411	Residential	Intermodal Yard	Full	Yes
0138-174-24	1515 West Kingman Street, San Bernardino, CA 92411	Residential	Intermodal Yard	Full	Yes
0138-174-25	1521 West Kingman Street, San Bernardino, CA 92411	Residential	Intermodal Yard	Full	No
0138-174-22	1496 West 4th Street, San Bernardino, CA 92411	Residential	Intermodal Yard	Full	Yes
0138-181-25	No Property Address Found	Vacant	Pedestrian Ramp and Retaining Wall	Partial	No
0138-182-19	436 North Mount Vernon Avenue, San Bernardino, CA 92410	Vacant	Pedestrian Ramp and Retaining Wall	Partial	No
0138-182-22	Protected per CA Govt. Code Sect. 6254.21	BNSF	Yard Buildings	Full	No
0138-211-01	1535 West 4th Street, San Bernardino, CA 92411	BNSF	Aerial Easements	Full	No
0138-211-06	No Property Address Found	BNSF	Aerial Easements	Full	No
0138-182-28	1364 West 4th Street, San Bernardino, CA 92411-1390	BNSF/Vacant	Intermodal Yard	Full	No
0138-182-29	1390 West 4th Street, San Bernardino, CA 92411-1364	BNSF/Vacant	Intermodal Yard	Full	No
0138-182-42	1430 West 4th Street, San Bernardino, CA 92411-1390	Industrial	Intermodal Yard	Full	No
0138-182-33	Protected per CA Govt. Code Sect. 6254.21	Industrial	Intermodal Yard	Full	No

Assessor Parcel Number	Address	Existing Land Use	Proposed Land Use	Partial or Full Acquisition	Require Relocation Yes/No
0138-182-32	1418 West 4th Street, San Bernardino, CA 92411	BNSF/Vacant	Intermodal Yard	Full	No
0138-182-39	1430 West 4th Street, San Bernardino, CA 92411	BNSF/Vacant	Intermodal Yard	Full	No
0138-182-14	1343 West Kingman Street, San Bernardino, CA 92411	BNSF/Vacant	Intermodal Yard	Full	No
0138-182-26	Protected per CA Govt. Code Sect. 6254.21	BNSF/Vacant	Intermodal Yard	Full	No
0138-182-27	1358 West 4th Street, San Bernardino, CA 92411	BNSF/Vacant	Intermodal Yard	Full	No
0138-174-14	Protected per CA Govt. Code Sect. 6254.21	BNSF/Vacant	Intermodal Yard	Full	No
0138-174-15	Protected per CA Govt. Code Sect. 6254.21	BNSF/Vacant	Intermodal Yard	Full	No
0138-174-21	Protected per CA Govt. Code Sect. 6254.21	BNSF/Vacant	Intermodal Yard	Full	No
0138-182-15	1337 West Kingman Street, San Bernardino, CA 92411	BNSF/Vacant	Intermodal Yard	Full	No
0138-182-16	Protected per CA Govt. Code Sect. 6254.21	BNSF/Vacant	Intermodal Yard	Full	No
0138-182-17	1317 West Kingman Street, San Bernardino, CA 92411	BNSF/Vacant	Intermodal Yard	Full	No
0138-182-18	Protected per CA Govt. Code Sect. 6254.21	BNSF/Vacant	Intermodal Yard	Full	No
0138-182-22	Protected per CA Govt. Code Sect. 6254.21	BNSF/Vacant	Intermodal Yard	Full	No
0138-182-40	1310 West 4th Street, San Bernardino, CA 92411	BNSF/Vacant	Intermodal Yard	Full	No
0138-182-41	1314 West 4th Street, San Bernardino, CA 92411	BNSF/Vacant	Intermodal Yard	Full	No
0138-182-24	1328 West 4th Street, San Bernardino, CA 92411	BNSF/Vacant	Intermodal Yard	Full	No
0138-182-25	Protected per CA Govt. Code Sect. 6254.21	BNSF/Vacant	Intermodal Yard	Full	No
0138-251-04	248 North Mount Vernon Avenue, San Bernardino, CA 92410	Single-family Residence	Street Widening	Full	Yes
0138-251-05	240 North Mount Vernon Avenue, San Bernardino, CA 92410	Vacant	Street Widening	Full	No

Assessor Parcel Number	Address	Existing Land Use	Proposed Land Use	Partial or Full Acquisition	Require Relocation Yes/No
0138-251-06	232 North Mount Vernon Avenue, San Bernardino, CA 92410	Single-family Residence	Street Widening	Full	Yes
0138-251-07	224 North Mount Vernon Avenue, San Bernardino, CA 92410	Single-family Residence	Street Widening	Full	Yes
0138-251-08 0138-251-09	202 North Mount Vernon Avenue, San Bernardino, CA 92410	Car Wash	Street Widening	Full	Yes
0138-283-40	196 North Mount Vernon Avenue, San Bernardino, CA 92410	Auto Repair	Ramp and Retaining Walls	Partial	No

Source: AECOM 2017.

As shown in Table 8, available data indicate that adequate resources, which encompass factors such as availability, funding, staffing, and time, exist for residential displacees, with the exception of available multi-family properties for rent. The replacement area evaluated is a five mile radius from the proposed project. Under the proposed project, there would be only one multi-family (duplex) acquisition. As of June 2017, there were plenty of comparable two- and three-bedroom units for rent or sale, as shown in Appendix E, Single-Family Rentals; Appendix F, Section 8 Rentals; and Appendix G, Single-family Dwellings, of the Draft Relocation Impact Statement, available through the Housing of Last Resort Program and offered as required by the federal Uniform Relocation Assistance and Real Property Acquisition Act of 1970.

Table 8. Summary of Relocation Resources Available Within 5 Miles (Residential)

Relocation Resource	For Rent	For Sale	Total Units
One-bedroom Houses	N/A	7	7
Two-bedroom Houses	5	48	53
Three-bedroom Houses	39	50	89
Four-plus-bedroom Houses	18	18	36
Condominiums	N/A	N/A	N/A
Multi-family Residences	3	6	9
Mobile Homes	N/A	N/A	N/A

Source: Caltrans 2017.
N/A = Not Available.

Under the proposed project, only one nonresidential displacee (car wash) is anticipated. Because of the specific nature of the nonresidential displacee, it is anticipated that comparable commercial properties will require modifications to meet the specific needs of the car wash, unless another car wash site is found upon implementation of relocation assistance, as shown in Table 9.

As part of project implementation, all acquisitions would be conducted in accordance with the federal Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended, and the California Relocation Act. In addition, the number of relocations would be a small percentage (3.7 percent) of the total number of households in the study area (771 households). Therefore, the proposed project would not result in an adverse effect.

Table 9. Summary of Relocation Resources Available Within 5 Miles (Nonresidential)

Relocation Resource	For Rent – Appropriate Zoning and Site Requirements	For Sale – Appropriate Zoning and Site Requirements	Total Units
Commercial Retail/Auto Related	5	8	13
Commercial Office/Special Services	N/A	N/A	N/A
Industrial Complex	N/A	N/A	N/A
Industrial/Commercial Properties	N/A	N/A	N/A
Farmland	N/A	N/A	N/A

Source: Caltrans 2017.
N/A = Not Available.

No-Build Alternative

There would be no property acquisitions under the No-Build Alternative because the proposed project would not be implemented.

6.5 Community Facilities and Services

Construction-Period Effects

Build Alternative

Construction effects on community facilities and services under the proposed project would be the same as under the 2011 approved project, except that the limits of construction have been expanded under the proposed project to accommodate additional improvements and the duration of construction would be longer (26 months under the proposed project compared to seven months under the approved project). Construction activities would now extend from just south of 5th Street to Rialto Avenue and between Kingman Street and West 4th Street and between Cabrera Avenue and Mount Vernon Avenue. This expands the number of community facilities and services that would be exposed to construction activities. For example, Gateway Park, Omnitrans Bus Terminal, and Our Lady of Guadalupe Church would be near the construction activities under the proposed project, as opposed to multiple blocks from construction activities under the 2011 approved project. Omnitrans bus terminal operations would not be directly affected, but Omnitrans bus operations could be affected for bus routes that travel through or along Mount Vernon Avenue, which includes Routes 1 and 15. Buses would be required to use detour routes while the bridge is closed. However, advance warning of any changes in bus routes would be posted in buses and at stations so that

travelers are aware in advance of any changes. Construction activities would result in temporary, localized, site-specific disruptions to the community in these areas, which would stem primarily from construction-related traffic changes associated with trucks and equipment in the area; partial and/or complete street and lane closures, some of which would require detours; increased noise and vibration; lights and glare; and changes in air emissions. However, no TCEs would be required from any community facilities.

Vehicle and pedestrian detours could also affect access to community facilities and services during the construction period. The community facilities that would be most affected by vehicle detours are the ones within the detour streets of Rialto Avenue, G and H Streets, and 5th Street, an area that includes the Metrolink San Bernardino Station Park & Ride. Patrons of community facilities outside the detour zone would need to use G and H Streets instead of Mount Vernon Avenue to cross the project area north/south, but access would be maintained at all times through detour routes. In addition, no parking at community facilities would be affected. In addition, because there would be no pedestrian access across the BNSF rail yard at the bridge during the two-year construction period, as well as any other period when the bridge may be out of service, access to nearby community facilities along or near Mount Vernon Avenue would be impaired, including access to Our Lady of Guadalupe Church, Villasenor Branch Library, and the Metrolink San Bernardino Station Park & Ride. TR-2 in the Final EA prepared for the approved project stated that a bus pass for area residents would be provided to compensate for pedestrian access that would be eliminated by closure of the bridge during construction (Caltrans 2010). Free bus passes, provided by the City of San Bernardino, for travel on existing Omnitrans routes would ensure mobility for area residents who would be affected by the bridge closure. Under the proposed project, this measure would be required for a longer period of time than under the approved project (at least an additional two months), which stated that the measure would be required from mid-2012 to mid-2014. This would minimize the effect of construction on access to community facilities and services.

Because construction activities would be temporary and would not be likely to have effects that would be substantially different from the same types of nuisance-like effects associated with typical construction activities throughout Southern California, no adverse effects are expected to result.

No-Build Alternative

The No-Build Alternative could adversely affect community facilities and services because no improvements would be made. In addition, the bridge could close after 2024, which would restrict access to community facilities and services. However, no acquisitions or relocations would occur under the No-Build Alternative.

Operational Effects

Build Alternative

The project features associated with the proposed project would not affect community facilities and services related to access and circulation beyond the level that was analyzed under the 2011 approved project. No community facilities or services would be displaced or relocated under the proposed project. The proposed project would result in improved connectivity by having a safer bridge crossing, which would benefit community facilities and services in the area.

As discussed in Section 6.3, Growth, because the proposed project would replace the existing Mount Vernon Avenue Bridge with a new bridge, with the same traffic capacity as the current bridge, it would not directly or indirectly induce growth beyond the level anticipated in the applicable regional and local plans. No new or expanded community facilities or services would be required.

No-Build Alternative

The No-Build Alternative could adversely affect community facilities and services because no improvements would be made. In addition, the bridge could close after 2024, which would further restrict access to community facilities and services.

7 Environmental Justice

The proposed project has been developed in accordance with Title VI of the Civil Rights Act of 1964, as amended, and Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. For adverse environmental justice effects to result from the proposed project, two conditions would need to exist. First, minority or low-income populations would need to reside in the parts of the study area that would be adversely affected by the proposed project. Second, any adverse effects would need to fall disproportionately on minority or low-income populations rather than proportionately on all populations that would be affected by the proposed project.

7.1 Affected Environment

To determine if environmental justice populations exist within the study area, the demographic profile of the study area was developed to identify the low-income and minority populations. For the purposes of this analysis, a census tract was considered to contain an environmental justice population if:

- The total minority population of the census tract block group(s) is more than 50 percent of the total population or disproportionately higher than that of the city and county, or
- The proportion of the census tract block group population that is below the federal poverty level exceeds that of the city where it is located.

Demographic data for the study area, shown above in Table 1, indicate that the proportion of the population composed of minority populations (Hispanic or Latino, Black or African American, Native American, Asian, or Native Hawaiian/Pacific Islander) is 96 percent, compared with 66 percent in the county and 80 percent in the city. Accordingly, the population within the study area is an environmental justice population.

7.2 Environmental Consequences

The environmental justice analysis considers the following factors: (1) the similarity of impacts on minority and/or low-income populations compared to the general population, (2) the generally equivalent efficacy of proposed minimization measures and project enhancements, and (3) the offsetting benefits of the transportation facility.

Build Alternative

Construction-Period Effects

Adverse Effects on General Population

The technical studies regarding air quality and noise and vibration indicate that no significant adverse effects are expected as a result of the proposed project, which is the same conclusion determined for the 2011 approved project. However, technical studies indicate that some potential effects are expected. The impacts identified in these technical reports and the measures to avoid or reduce them can be summarized as follows:

- **Air Quality:** During construction, short-term degradation of air quality may occur because of the release of particulate emissions (fugitive dust), which would be generated by excavation, grading, hauling, and other activities related to construction. Emissions from construction equipment also are anticipated and would include carbon monoxide (CO), oxides of nitrogen (NO_X), reactive organic gases (ROGs), directly emitted particulate matter (particulate matter less than 10 microns [PM_{10}] and particulate matter less than 2.5 microns [$PM_{2.5}$]), and toxic air contaminants (TACs) (also known as mobile-source air toxics [MSATs]), such as diesel exhaust particulate matter. Construction-related effects on air quality from most highway/bridge projects would be greatest during the site preparation phase because most heavy construction equipment emissions are associated with the excavation, handling, and transport of soils to and from the site (ICF 2017). However, the project would conform to Caltrans construction requirements, as specified in Caltrans' 2015 Standard Specifications, Section 14-9.02 (Air Pollution Control) and Section 14-11.04 (Dust Control), for asphalt concrete emissions and all earthwork, clearing and grubbing, and roadbed activities involving heavy construction equipment. The contractor would comply with all air pollution control ordinances and statutes that apply to any work performed pursuant to the contract, including any air pollution control rules, regulations, ordinances, or statutes specified in Section 11017 of the Government Code. Compliance with these specifications would minimize the air quality effects in the study area, avoiding a significant adverse effect.
- **Noise and Vibration:** Noise from construction activities may intermittently dominate the noise environment in the immediate area of construction. However, noise associated with construction is controlled by Caltrans Standard Specification Section 14-8.02, "Noise Control." No significant adverse noise impacts from construction are anticipated because construction would be conducted in accordance with Caltrans Standard Specifications Section 14.8-02. Construction noise would be short term and intermittent.

As described under Section 6, the proposed project would result in vehicle and pedestrian detours. Vehicle detours would affect equally both minority and low-income populations within the study area as well as the general population within a few miles of the bridge. Pedestrian detours are more likely to affect minority and low-income populations and those who rely on non-motorized travel within the study area. However, that is due to the proximity of those groups to the proposed project.

Other construction-period impacts discussed in this memorandum would be avoided or substantially minimized. However, for all other impacts, (1) the community, in general, would be similarly affected; (2) the effects of the project on minority and/or low-income populations would

not be more severe compared with the effects on non-low-income and non-minority populations; and (3) the impacts on minority and/or low-income populations would be similar to those on the general population.

Disproportionately High and Adverse Effects on Minority and Low-Income Populations

Environmental justice considerations require an assessment of whether the effects of the proposed project on minority and low-income groups could be considered disproportionately high and adverse, taking into consideration the minimization measures that have been recommended in the technical studies, the impact avoidance and minimization efforts that have occurred during the project planning and development process, and the potential benefits that would accrue within the community.

Efficacy of Minimization Efforts – Unavoidable Adverse Effects

Of the effects identified thus far in the technical studies that are beyond those identified in the 2011 approved project, none are unavoidable adverse effects. All effects could be avoided or substantially minimized.

Other Measures to Minimize Adverse Effects

As part of the project planning and development process that has occurred over a period of more than 10 years, efforts have been taken to avoid or minimize impacts on the surrounding community that could result from a bridge reconstruction project. Most notably, it was the likelihood of potentially severe community impacts (i.e., substantial property acquisitions and displacements) that led to the withdrawal of several alternative alignments from further consideration.

Project Benefits

Implementation of the proposed project would unquestionably have offsetting benefits that would accrue within the community. Residents, businesses, and visitors would be afforded a safer and more reliable bridge. A critical link in the local and regional circulation system would be restored, which could help stimulate social and economic redevelopment projects within the community.

Potential Disproportionately High and Adverse Effects

The determination of whether or not the effects of the proposed project are disproportionately high and adverse depends on whether (1) the effects of the project are borne predominately by a minority or low-income population or (2) the effects of the project are appreciably more severe or greater in magnitude on minority or low-income populations compared with the effects on non-minority or non-low-income populations (see the Federal Highway Administration's *Western Resource Center Interim Guidance – Addressing Environmental Justice in the EA/EIS* [1999]).

Although the effects of the proposed project would occur within an area with a population that is predominately minority, these effects cannot reasonably be considered disproportionately high and adverse under the circumstances. The two census block groups in the project study area are composed of substantial proportions of minority populations. The proportion of these groups, however, is not determinative of whether there is a disproportionately high and adverse effect. Instead, it is more appropriate to conclude that, even though these groups could bear a large part of the burden associated with the proposed project, primarily due to their proximity to short-term

construction activities, the community in general would be similarly affected. The bridge is an important part of both the local and regional circulation system. Consequently, local motorists and pedestrians from the immediate project area, as well as those traveling to and from the project area from elsewhere, would all be inconvenienced by traffic delays and other disruptions during the project construction period.

As detailed more fully below in Section 8, the City of San Bernardino has instituted public involvement and community outreach efforts to ensure that issues of concern or controversy to minority and low-income populations are identified and addressed where practicable as part of the project planning and development process as well as the environmental process.

Conclusion

Given the results of technical studies conducted thus far, taking into consideration (1) the similarity of impacts on minority and low-income populations compared to the general population, (2) the generally equivalent efficacy of proposed minimization measures and project enhancements, and (3) the offsetting benefits of the transportation facility, a temporary disproportionately high and adverse effect on minority and/or low-income population groups, per Executive Order 12898 regarding environmental justice, would not result from the proposed project.

Operational Effects

Adverse Effects on General Population

The technical studies regarding permanent acquisitions/relocations indicate that no significant adverse effects are expected as a result of the proposed project, which is the same conclusion determined for the 2011 approved project. However, technical studies indicate that some potential effects are expected. The impacts identified in these technical reports, as well as the measures to avoid or reduce them, can be summarized as follows:

- Permanent Acquisitions/Relocations: Effects resulting from the proposed project are primarily due to additional construction effects on the community from an expanded construction footprint and temporary and permanent acquisitions, resulting in relocations. A total of 30 relocations would be required (28 single-family residents, one multi-family residence, and one nonresidential business).

Disproportionately High and Adverse Effects on Minority and Low-Income Populations

Environmental justice considerations require an assessment of whether the effects of the proposed project on minority and low-income groups could be considered disproportionately high and adverse, taking into consideration the minimization measures that have been recommended in the technical studies, the impact avoidance and minimization efforts that have occurred during the project planning and development process, and the potential benefits that would accrue within the community.

Efficacy of Minimization Efforts – Unavoidable Adverse Effects

Of the effects identified thus far in the technical studies that are beyond those identified in the 2011 approved project, none are unavoidable adverse effects. All effects could be avoided or substantially minimized.

Other Measures to Minimize Adverse Effects

As part of the project planning and development process that has occurred over a period of more than 10 years, efforts have been taken to avoid or minimize impacts on the surrounding community that could result from a bridge reconstruction project. Most notably, it was the likelihood of potentially severe community impacts (i.e., substantial property acquisitions and displacements) that led to the withdrawal of several alternative alignments from further consideration.

Project Benefits

Implementation of the proposed project would unquestionably have offsetting benefits that would accrue within the community. Residents, businesses, and visitors would be afforded a safer and more reliable bridge. A critical link in the local and regional circulation system would be restored, which could help stimulate social and economic redevelopment projects within the community.

Potential Disproportionately High and Adverse Effects

The determination of whether or not the effects of the proposed project are disproportionately high and adverse depends on whether (1) the effects of the project are borne predominately by a minority or low-income population or (2) the effects of the project are appreciably more severe or greater in magnitude on minority or low-income populations compared with the effects on non-minority or non-low-income populations (see the Federal Highway Administration's *Western Resource Center Interim Guidance – Addressing Environmental Justice in the EA/EIS* [1999]).

Although permanent acquisitions and the relocation of residents and businesses would occur in an area that is predominately minority, adverse effects from permanent acquisitions that would require relocations (28 of the 771 households in the study area) are not anticipated after implementation of avoidance and minimization measures. The number of relocations (28 single-family residences) is relatively small compared with the overall number of households in the study area (771 households). In addition, these effects cannot reasonably be considered disproportionately high and adverse under the circumstances. The two census block groups in the project study area are composed of substantial proportions of minority populations. The proportion of these groups, however, is not determinative of whether there is a disproportionately high and adverse effect. Instead, it is more appropriate to conclude that, even though these groups could bear a large part of the burden associated with the proposed project, primarily due to their proximity to the project, the community in general would be similarly affected. The bridge is an important part of both the local and regional circulation system. Consequently, local motorists and pedestrians from the immediate project area, as well as those traveling to and from the project area from elsewhere, would all be inconvenienced by traffic delays and other disruptions during the project construction period.

As is detailed more fully below in Section 8, the City of San Bernardino has instituted public involvement and community outreach efforts to ensure that issues of concern or controversy to

minority and low-income populations are identified and addressed where practicable as part of the project planning and development process as well as the environmental process.

Conclusion

Given the results of technical studies conducted thus far, taking into consideration (1) the similarity of impacts on minority and low-income populations compared to the general population, (2) the generally equivalent efficacy of proposed minimization measures and project enhancements, and (3) the offsetting benefits of the transportation facility, a disproportionately high and adverse effect on minority and/or low-income population groups, per Executive Order 12898 regarding environmental justice, would not result from the proposed project.

No-Build Alternative

The No-Build Alternative would not have a disproportionately high and adverse effect on minority and/or low-income population groups.

8 Public Coordination

Efforts will continue to be made to ensure meaningful opportunities for public participation during the project planning and development process. This may include, but not necessarily be limited to, additional community meetings, informational mailings, a project website, and news releases to local media. The community outreach and public involvement programs for the proposed project would seek to actively and effectively engage the affected community and include mechanisms to reduce cultural, language, and economic barriers to participation.

The proposed project would also comply with applicable federal requirements promulgated in accordance with Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency (August 11, 2000), which requires federal programs and activities to be accessible to persons with limited English language proficiency.

The proposed project would be developed in accordance with Title VI of the Civil Rights Act of 1964, which provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity that receives federal financial assistance. In addition, the proposed project would be developed in conformity with related statutes and regulations that mandate that no person in the State of California shall, on grounds of race, color, sex, age, national origin, or disabling condition, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity administered by or on the behalf of Caltrans.

9 Avoidance, Minimization, and Mitigation Measures

Measures R-1, R-2, EJ-1, UT-1, UT-2, and TR-2, outlined in the 2011 approved project, apply to the revised project and will be implemented. In addition to these measures, the following new

avoidance and minimization measures have been incorporated into the project to minimize potential environmental effects:

- **C-1:** During construction, access to all properties will be maintained.
- **C-2:** SBCTA shall prepare a sensitive community outreach plan that will identify and develop outreach activities targeted to minority and low-income residents during the final design and implementation process for the project. Community outreach should include providing timely information about anticipated construction activities to affected citizens and adjacent property owners. Notification methods will include options that are readily available to the target population, such as multi-language fliers, mailers, and posters, as well as emails and electronic messaging on the freeway.
- **C-3:** SBCTA shall provide additional relocation assistance and counseling resources to persons and businesses beyond the requirements of the Federal Uniform Relocation Assistance and Real Properties Acquisition Policies Act, as amended, to ensure adequate relocation and a decent, safe, and sanitary home for displaced residents. Spanish-speaking relocation assistance personnel will be required and will be provided by SBCTA. All eligible displacees will be entitled to moving expenses. All benefits and services will be provided equitably to all residential and business displacees without regard to race, color, religion, age, national origins, or disability, as specified under Title VI of the Civil Rights Act of 1964. All relocation activities will be conducted by the implementing agencies in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended.

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