

## 6. Significant Unavoidable Adverse Impacts

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Chapter 1, *Executive Summary*, contains Table ES-4, which summarizes the impacts, mitigation measures, and levels of significance before and after mitigation. Although mitigation measures would reduce the level of impact, the following impacts would remain significant, unavoidable, and adverse after mitigation measures are applied:

### Cultural Resources

- **Impact 5.3-1:** Buildout of the CollegeTown Specific Plan would involve demolition of buildings at 601 and 651 Titan Drive that are eligible for listing on the National Register of Historic Places and California Register of Historic Resources, and are eligible for listing as Significant Properties by the City of Fullerton. Mitigation Measure 3-2 requires recording historical and architectural information and photo-documentation of the buildings, consistent with Historic American Building Survey standards and guidelines. Mitigation Measure 3-3 requires monitoring and documentation of removal of the buildings by a qualified archaeologist to ensure that no archaeological resources predating the buildings are inadvertently lost during demolition. Impact 5.3-1 would remain significant and unavoidable after implementation of Mitigation Measures 3-2 and 3-3.

### Air Quality

- **Impact 5.2-1:** The proposed project would result in a substantial increase in growth compared to what was identified in the City's General Plan and would exceed SCAQMD's regional operational thresholds. As a result, although the project is consistent with the land use strategies to reduce regional vehicle miles traveled, the proposed project could potentially exceed the assumptions in the AQMP and would not be considered consistent with the AQMP. Mitigation measures applied for Impact 5.2-2 and the design and regulatory standards of the Specific Plan would reduce the project's regional construction-related and operational phase criteria air pollutant emissions to the extent feasible. However, given the potential increase in growth and associated increase in criteria air pollutant emissions, the project would continue to be potentially inconsistent with the assumptions in the AQMP. Impact 5.2-1 would remain significant and unavoidable.
- **Impact 5.2-2:** Project-related construction emissions have the potential to exceed the SCAQMD regional thresholds during ground-disturbing activities and during architectural coating phases or could potentially exceed the SCAQMD thresholds if one or more construction phases overlap. With implementation of Mitigation Measures 2-1 through 2-3, construction emissions would be minimized to the extent feasible. Buildout of the CollegeTown Specific Plan would occur over approximately 15 years or longer. Construction time frames and equipment for specific projects are not available. There is a potential for multiple developments to be constructed at any one time, resulting in significant construction-related

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emissions. Therefore, despite adherence to Mitigation Measures 2-1 through 2-3, regional construction emissions identified in Impact 5.2-2 would remain significant and unavoidable.

- **Impact 5.2-3:** Operation of the project would generate air pollutant emissions that exceed SCAQMD's regional significance thresholds. Consequently, the project would significantly contribute to the nonattainment designations of the SoCAB. Compliance with the Specific Plan would require applicants for new development projects within the CollegeTown Specific Plan to designate spaces for electric vehicle charging in order to encourage residents to take zero- or near-zero-emission vehicles. The Specific Plan also requires installation of energy efficient appliances to reduce natural gas consumption and energy demand from new buildings. The Specific Plan also requires that applicants for nonresidential land uses implement an employee trip commute reduction plan to further reduce single-occupancy vehicle trips. Compliance with Mitigation Measures 2-4 through 2-7 would reduce operational phase criteria air pollutants to the extent practicable. However, criteria air pollutant emissions would continue to exceed the SCAQMD regional significance thresholds, and Impact 5.2-3 would remain significant and unavoidable.
- **Impact 5.2-4:** Construction activities associated with the CollegeTown Specific Plan would cause short-term increases in the concentration of criteria air pollutants. With implementation of Mitigation Measures 2-1 through 2-2, construction emissions would be minimized to the extent feasible. Buildout of the CollegeTown Specific Plan would occur over approximately 15 years or longer. Construction time frames and equipment for individual projects are not available. Because existing sensitive receptors may be close to project-related construction activities, construction emissions generated by individual projects have the potential to exceed SCAMQD's LSTs. Therefore, despite adherence to Mitigation Measures 2-1 through 2-2, localized construction emissions identified in Impact 5.2-4 would remain significant and unavoidable.
- **Impact 5.2-6:** Residential buildings within 90 feet of SR-57 would be exposed to elevated levels of PM<sub>10</sub> emissions that exceed the incremental localized significance threshold of 2.5 µg/m<sup>3</sup>. Mitigation Measure 2-4 and 2-5 would ensure risk are minimized to the extent feasible. It should be noted that over the five years of meteorological data evaluated in the air dispersion model, the total number of days the 24-hour PM<sub>10</sub> concentration was over 2.5 µg/m<sup>3</sup> with mitigation was one day. Additionally, acute impacts to residents of the project from existing SR-57 emissions, though incrementally higher because of proximity to the freeway, are considered typical for residents in the entire basin because the maximum background PM<sub>10</sub> concentrations in the vicinity of the site already exceed the California ambient air quality standard (AAQS) for the 24-hour and annual averaging times (according to the Central Orange County Monitoring Station). However, due to the high volume of traffic on State Route 57, Minimum Efficiency Rating Value (MERV) filters would not reduce concentrations of PM below the 24-hour AAQS one day per year. Consequently, Impact 5.2-6 would remain significant and unavoidable.

### Noise

- **Impact 5.9-4:** Construction activities associated with the CollegeTown Specific Plan would result in a substantial temporary increase in ambient noise levels near noise-sensitive receptors. Mitigation Measure

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9-1 would reduce noise generated by construction activities associated with the project to the extent feasible. Project-related construction activities would occur during the least noise-sensitive portion of the day, and mitigation measures would reduce noise. It should be noted that although the construction activities could occur during a 15-year period—the anticipated time frame for project buildout—impacts of construction activities at any one particular receptor would be affected for a much shorter duration (e.g., months at any one location), because construction impacts are localized and generally limited to receptors in the immediate vicinity of construction sites. Furthermore, construction of new residential and nonresidential land uses would depend on market conditions, resulting in intermittent construction activities within the Specific Plan area. Construction noise impacts would depend on the distance from the receptor to the location where individual construction activities (e.g., construction subphases) would occur and would also depend on the presence of intervening structures. Nonetheless, due to the length of construction activities and level of noise from the possible overlap of construction projects, Impact 5.9-4 would remain significant and unavoidable.

- **Impact 5.9-6:** The additional traffic plus a shift in the centerline of Chapman Avenue closer to the homes to the south would result in a substantial (+ 3dBA) increase in noise levels. The 6- to 8-foot-high masonry wall identified in Mitigation Measure 9-3 would offset the noise caused by additional traffic and the additional lane on Chapman Avenue, and would provide a net decrease in noise levels at the nearest homes south of Chapman Avenue. Therefore, noise impacts would be less than significant. However, because implementation of a sound-wall along the frontage road has not yet been determined to be feasible, Impact 5.9-6 would be conservatively considered significant and unavoidable.

### Transportation and Traffic

- **Impact 5.13-1:** Mitigation Measures have been identified to reduce project-level traffic impacts to the extent feasible. With mitigation, the proposed project would result in significant impacts at one study-area intersection and 17 freeway mainline segments. While improvements to SR-57 northbound ramps at Chapman Avenue are proposed, these improvements are outside of the City of Fullerton's jurisdictional control because the improvement would require approval from Caltrans who is the owner/operator of this intersection and required improvements under the freeway. Likewise, improvements to the 17 freeway mainline segments are also within the jurisdictional control of the Caltrans. Consequently, project-level traffic impacts under Impact 5.13-1 would remain significant and unavoidable.
- **Impact 5.13-2:** Mitigation Measures have been identified to reduce cumulative impacts to the extent feasible. For these improvements, applicants for development project would be required to contribute fair share fee as part of the City's Traffic Mitigation Fee Program. With mitigation, the proposed project would result in significant impacts at three study-area intersections and 17 freeway mainline segments. Improvements identified in the Transportation Impact Analysis Report were identified as infeasible due to physical constraints at State College Boulevard at Chapman Avenue. In addition, measures to the SR-57 ramps and SR-57 underpass are within the jurisdictional control of Caltrans and therefore, the City cannot guarantee implementation of the measures identified. Consequently, cumulative traffic impacts under Impact 5.13-2 would remain significant and unavoidable.

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